

# **DOCUMENT 18**

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**WASHINGTON**

October 9, 2023

VIA E-MAIL [VRW@JUDGEWALKER.COM]

John Taladay  
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The Honorable Vaughn R. Walker  
Law Office of Vaughn R. Walker  
Four Embarcadero Center, Suite 2200  
San Francisco, CA 94111

Re: In re Cathode Ray Tube (CRT) Antitrust Litigation, MDL No. 1917, Master File  
No. 07-CV-944-JST

Dear Judge Walker:

Defendants Irico Group Corp. and Irico Display Devices Co., Ltd. (collectively, “Irico”) write with respect to Your Honor’s Interim Reports and Recommendations on Plaintiffs’ Motion for Discovery Sanctions dated August 4, 2023 (ECF No. 6233) (“First Interim Order”), and September 1, 2023 (ECF No. 6275) (“Second Interim Order”) (collectively, “Orders”). This letter discusses three topics: (1) we provide an update regarding Irico’s compliance with the Orders; (2) we ask that Your Honor approve a modified version of Plaintiffs’ search terms to identify responsive documents, which Plaintiffs oppose; and (3) we request a short further extension to October 23, 2023, for the completion of Irico’s response to the Orders, which Irico will begin providing to Plaintiffs by the current deadline of October 13th.<sup>1</sup>

### **1. Update on Compliance Efforts to Date**

Irico and Baker Botts have undertaken extraordinary efforts to comply with Your Honor’s Orders and continue to work as expeditiously as possible on all fronts. As the Court is aware, Irico had already been working to comply with the Your Honor’s First Interim Order throughout the month of August through the efforts of Norton Rose Fulbright and with oversight by Baker Botts. After Your Honor’s Second Interim Order, Baker Botts needed to restart certain aspects of the investigation and processes to comply with new requirements that specified which entities were

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<sup>1</sup> As discussed in greater detail below, should Your Honor determine that Irico must review all of the Chinese-language documents that hit on Plaintiffs’ overbroad search terms, Irico would need at least an additional 40 days from the current deadline to review and produce any responsive documents from that set. Irico would still plan to produce responsive materials from its proposed search terms by October 23.

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required to undertake specific requirements of Your Honor's Orders. As required, I have personally directed and supervised the efforts and processes described below.

Since the Second Interim Order, Irico and Baker Botts have completed the following tasks in accordance with U.S. discovery standards:<sup>2</sup>

- A Baker Botts attorney of record traveled to China along with a bilingual U.S.-based forensic collection specialist from BDO, a U.S. discovery vendor, to personally implement the investigative steps described below under my direction;
- The same Baker Botts attorney took physical custody of Mr. Su's former laptop and personally oversaw BDO's imaging of the laptop's complete content and forensic analysis of all recovered files;
- Baker Botts, through an interpreter, conducted interviews of 23 current or former employees of Irico Group and its subsidiaries regarding relevant issues, including their knowledge of Mr. Su's deposition, Mr. Su's departure from Irico, Mr. Su's current employment, any ongoing relationship between Irico and Mr. Su, communications with Mr. Su, information regarding other individuals who may have relevant knowledge, and potential locations of responsive documents;
- Baker Botts identified 15 custodians potentially in possession of relevant documents and undertook forensic collection of email and internal text messaging. *See Attachment A* for a list of the selected custodians;
- BDO, under the direction of Baker Botts, collected all emails and internal text messages from the messaging system (including attachments) for all 15 custodians directly from the back-end server used by Irico, for all relevant time periods without any additional limitation.<sup>3</sup> This resulted in over 72,000 documents being collected from the relevant custodians;
- Baker Botts, with assistance from BDO, collected certain other responsive materials based on the interviews described above, including HR files, official

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<sup>2</sup> The list below is intended to provide Your Honor a high-level overview of the steps taken to comply with the Orders. Further details on the processes implemented will be provided in a declaration when the process is complete as required by the Orders.

<sup>3</sup> The relevant time periods used for collection were January 1, 2021, through September 1, 2023 (or the last day of employment with any Irico company), for any custodians with any knowledge or involvement regarding Mr. Su's requested deposition, and January 1, 2022, through September 1, 2023 (or the last day of employment with any Irico company), for all other custodians.

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personnel announcements, and personal WeChat communications from personal devices to the extent the individual permitted such collection;

- Baker Botts utilized the complete list of search terms offered by Plaintiffs on September 7<sup>th</sup> and also developed additional search terms based on information learned from the interviews and the targeted document collections described above to identify potentially responsive documents. BDO then applied Plaintiffs' proposed search terms to all collected emails, internal enterprise messaging and shared files, and files recovered from Mr. Su's laptop, resulting in over 40,000 documents with direct hits, making up over 55 percent of all files collected from custodians.<sup>4</sup> As discussed below in Part 2 of this letter, Baker Botts then applied a set of "Su qualifiers" to the Plaintiffs' proposed search terms and added additional relevant search terms based on our investigation, resulting in a subset of 3,300 documents with direct hits for further review and processing;<sup>5</sup>
- These potentially responsive materials were then screened for state secrets as required by Chinese law. The state secret review was conducted by the AnJie law firm, one of China's largest and most highly regarded law firms, working with BDO under Baker Botts' direction, not under the direction of Irico. A small number of documents were withheld for state secret purposes and were handled as discussed below. All documents not deemed to contain states secrets were exported to a U.S.-based server for review by and under the supervision of Baker Botts attorneys;
- The three-week extension previously approved by the Special Master included one week from September 29 through October 6 that comprised the Chinese Golden Week holiday, a major annual holiday in China. In seeking the previous three-week extension, Baker Botts had planned that all of the steps described above would have been completed and the materials would all be loaded to the U.S.-based server for review before the start of the Chinese Golden Week holiday. Because of both logistical and technical challenges, and despite the efforts of Irico and its vendors during the holiday period, we were not able to accomplish all of those steps prior to the Golden Week holiday. However, as of yesterday, this process is now complete for the search terms described above, i.e., those documents that hit on a search term subject to the "Su qualifiers" described below. Baker Botts is now in

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<sup>4</sup> To account for family members and potentially related internal messages and attachments, approximately 55,000 files in total were identified as either direct search hits on Plaintiffs' proposed terms or potentially related to those direct hits.

<sup>5</sup> Accounting for family members and potentially related internal messages and attachments, a total of approximately 9,400 files were identified and segregated for further review under the proposed terms with "Su qualifiers."



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the process of conducting and directing the review of these materials for responsiveness and privilege;

- During this process, Baker Botts met and conferred twice with Plaintiffs regarding their proposed search terms and the need for reasonable limitations given the extremely high hit rate, and to discuss Baker Botts' proposed terms that incorporate such reasonable limitations, but Plaintiffs were not willing to discuss any specific limitations to their search terms, including applying the "Su qualifiers" to their search terms; and
- Finally, because state secret review was required before the documents could be transferred to the U.S. for responsiveness review, we had not yet determined whether any of the documents withheld for state secret purposes were responsive to the requirements of the Order. To address this issue, a bilingual U.S.-barred lawyer from the AnJie law firm, who was trained by Baker Botts regarding the scope of the Orders and worked under Baker Botts' direction, is conducting a relevance review of the documents withheld for state secret content.

## **2. Dispute Regarding Search Terms**

One of the most impactful changes in the Second Interim Order was that the Plaintiffs could provide search terms to be applied against the collected electronically stored information. As Your Honor is already aware, Plaintiffs took full advantage of Your Honor's offer and provided a list of around 80 terms without any qualifiers or limitations. *See* Attachment B. Most strikingly, Plaintiffs suggested search terms to be applied to the documents of all custodians without any requirement that any of these search terms relate to Mr. Su. As discussed below, this results in a gross over-identification of potentially responsive materials and would require an excessive degree of time and effort to review without the prospect of any meaningful uptick in responsive documents. Plaintiffs have declined to modify any the search terms to allow for some relevance to Mr. Su. Herein, Irico is proposing to apply all of Plaintiffs' search terms modified only by certain "Su qualifiers."

As detailed above, Baker Botts identified 15 custodians with ESI potentially responsive to the Orders. These custodians ranged from the most senior leadership at the company, to those in Human Resources who touched briefly on limited issues related to Mr. Su. Most of these individuals had only limited interactions, if any, with Mr. Su. Nonetheless, because our collection was comprehensive as to their electronic files on the company's servers, over 72,000 documents were collected during this process.

Despite most of these custodians having little to do with Mr. Su, over 40,000 of the documents hit on one of Plaintiffs' search terms. *See* Attachment C for Plaintiff search term hits on email files and Attachment D for Plaintiff search term hits on internal text messages. This was inevitable given that Plaintiffs made no effort to limit search terms to identify documents

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specifically relevant to Mr. Su. For example, one of Plaintiffs search terms was “leadership.” Plaintiffs seek to require Irico to identify and review every single document that used the word “leadership” regardless of whether it had any relevance to Mr. Su or whether Mr. Su was even mentioned in the document.<sup>6</sup> Over 14,000 documents (approximately 20 percent of the collected documents) hit on this term alone when combining the hits in for emails and internal text messages. Similarly, Plaintiffs’ search terms include numerous terms related to personnel and human resource functions but again make no effort to identify those documents specifically related to Mr. Su. Given that three of the custodians actually work in the human resources area, it is no surprise that almost 4,000 documents hit on the term “Human Resources Department.” Again, applying Plaintiffs’ unmodified search terms would require that we review all such documents for relevance, irrespective of whether they conceivably have anything to do with Mr. Su.

Baker Botts had already intended to use many of the same general terms that Plaintiffs suggested, as well as additional relevant terms that it intended to apply with appropriate qualifiers, consistent with U.S. discovery practice, to identify when those terms were used in reference to or related to Mr. Su. These “Su qualifiers” simply require that any document hitting on Plaintiffs’ search terms also include a term relating to Mr. Su either by his name (in various forms identified by Plaintiffs), his employee ID number, his citizen ID number or his email address. Specifically, the “Su qualifiers” include:

- “苏晓华,” Mr. Su’s full name in Chinese;
- “苏总,” an abbreviation for “General Manager Su,” sometimes used to refer to Mr. Su by his former colleagues;
- Xiaohua, Mr. Su’s given name in English;
- Mr. Su’s 18-digit Chinese citizen ID number;
- 100751, Mr. Su’s Irico employee ID number;
- sxh@ch.com.cn, Mr. Su’s email address; and
- sxh, the prefix for Mr. Su’s email address.

For example, Irico still ran the term for “leadership” but also required that term to appear somewhere in the same document as one of the Su qualifiers. This appropriate focus on Mr. Su reduced the number of hits on the term “leadership” from approximately 14,000 to approximately 1,000, which captures all instances where Mr. Su was mentioned or referenced in the same document as the term “leadership.” Applying these Su qualifiers to all of the search terms suggested by Plaintiffs reduced the total number of hits to be reviewed from over 40,000 to approximately 3,300 (not including attachments), a number much more in line with what would be expected given the narrow scope of the issues at hand and the broad responsibilities of most of

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<sup>6</sup> Note that all of these documents are in Chinese, which increases the time and burden in reviewing materials and identifying responsive materials.

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the custodians.<sup>7</sup> See Attachment E for search term hits with “Su qualifiers” on email files and Attachment F for search term hits with “Su qualifiers” on internal text messages.<sup>8</sup>

Baker Botts presented these results to Plaintiffs in the hopes of limiting the searches to more reasonable terms, but Plaintiffs surprisingly refused to engage in any substantive discussion on specific search terms. Previously, when Irico raised concerns with Your Honor about the scope of the search terms, Plaintiffs assured Your Honor (and Irico) that: “To the extent Irico communicates any legitimate concerns about any of these terms, Plaintiffs will address them immediately ....” Plaintiffs’ Letter Response to Request for Extension, at 2 (Sept. 14, 2023). Instead, Plaintiffs took the view that Baker Botts was required to produce all responsive documents under Your Honor’s Orders and “Plaintiffs cannot modify this requirement.” See Attachment G. That suggestion is wrong on at least two fronts. First, it is diametrically opposed to the representation that Plaintiffs made to Your Honor that it could and would work with Baker Botts to address plainly legitimate issues with their search terms. Second, it undermines the Special Master’s reasonable instruction, consistent with U.S. discovery practice, that search terms be used here as a way of identifying potentially relevant documents (rather than effectively demanding that Irico review every single communication from 15 employees over a span of years for targeted information relating to Mr. Su, which would be both unreasonable and unworkable).

So now Irico must ask for the Special Master’s assistance in resolving this dispute. The Second Interim Order states: “If Irico’s counsel deems any search terms improper, they can bring that matter to the undersigned’s attention and withhold production of selected documents until the objection is resolved. But collection of responsive documents precedes objections.” ECF No. 6324 at 5. Irico and Baker Botts are following Your Honor’s guidance exactly. We have collected all of the relevant materials and provided search term hit results to the Plaintiffs and Your Honor, but we request reasonable modification to the Plaintiffs’ search terms. As detailed above, we believe that adding the “Su qualifiers” described above to the search terms is appropriate and in accordance with U.S. discovery best practice, whereas Plaintiffs’ unbounded search terms are not. Without awaiting the Special Master’s decision on this dispute, we are moving forward on the review and production of documents that hit on the search terms applying the “Su qualifiers” and will be producing responsive materials as soon as possible.

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<sup>7</sup> In our unsuccessful meet and confer conversations with Plaintiffs, they appeared to suggest that Baker Botts should focus on reviewing all or some set of the documents that that did not hit on any terms with “Su qualifiers” to confirm that none of the documents contain responsive information. Focusing our efforts on the documents *least* likely to contain responsive material, however, is backwards, and Plaintiffs know that this is impractical given the sheer volume of the documents that hit on their unqualified search terms as well as the restrictions in China on releasing documents until they have been reviewed for state secrets.

<sup>8</sup> Minor modifications have been made to these charts since they were provided to Plaintiffs to account for typographical errors and search corrections, neither of which impacted the search results in any meaningful way.

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### 3. Request for Extension of Ten Days

The identification, collection and processing of the responsive documents and the collection of relevant information has been a laborious process as detailed above. We note again that the process requiring Baker Botts (and my own) direct involvement had to be restarted after the September 1<sup>st</sup> Order. Irico, Baker Botts and its vendors have faced many technical, logistical, and geographic hurdles, but we can assure the Special Master that extraordinary efforts have been undertaken and we have made substantial progress in the five weeks since its issuance. However, because the potentially responsive materials from China were not able to be uploaded to the U.S. for completion of review until after the Chinese Golden Week holiday, which just concluded, we will not be able to fulfill all requirements of the Orders by the current deadline of October 13<sup>th</sup>.<sup>9</sup>

We intend to produce materials to Plaintiffs on a rolling basis beginning with an initial production of responsive materials by the current deadline of October 13<sup>th</sup>. We believe we will need an additional 10 days (until October 23<sup>rd</sup>) to complete the review and production of the responsive materials and complete the other requirements of the Order, provided the Special Master approves the use of the Su qualifiers as discussed above. Should Your Honor require the application of all of Plaintiffs' suggested search terms without the Su qualifiers, however, the volume of documents to be processed, reviewed for state secret content, and reviewed for responsiveness would increase by well over five-fold. In that case, we estimate that Baker Botts would require an extension of at least 40 additional days from the current deadline to comply.

Thank you for your consideration of these issues.

Sincerely,  
*/s/ John Taladay*  
John Taladay

cc: Tanveer Singh (tanveer.singh@fedarb.com)  
R. Alexander Saveri (rick@saveri.com)  
Geoffrey C. Rushing (geoff@saveri.com)

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<sup>9</sup> As part of our meet and confer process, we asked for Plaintiffs' position on a one-week extension of the current deadline. Since the time of these discussions, there was a further, short delay in the transmission of the materials from China at the end of the Chinese Golden Week holiday so we now believe a ten-day extension will be necessary. Plaintiffs took no affirmative position on our request, but instead stated that the request "is more appropriately directed to Judge Walker." See Attachment G.

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Matthew D. Heaphy (mheaphy@saveri.com)

Mario N. Alioto (malioto@tatp.com)

Lauren C. Capurro (lauren russell@tatp.com)

Daniel E. Birkhaeuser (dbirkhaeuser@bramsonplutzik.com)

# Attachment A

*Irigo Custodian List - Oct. 6, 2023*

<b>Custodian Name</b>	<b>Position</b>
Bao Yong	Secretary of Commission for Discipline Inspection of CCP Committee of Irigo Group
Bing Zhang	Executive Director of Xianyang Irigo Group Industrial Co., Ltd.
Gao Qian	General Business Supervisor and Confidential Officer of the Group Office of Irigo Group
Guo Quan	Director of Group Office of Irigo Group
Hao Li	Director of Company Office of Xianyang Irigo Group Industrial Co, Ltd.
Mai Ya	HR Employee of Irigo Group
Shi Feng	HR Director of Irigo Group
Si Yuncong	(former) Chairman of Irigo Group
Su Xiaohua	Focus of investigation
Wang Jijun	Chief Financial Officer, Irigo (Foshan) Flat Panel Display Co., Ltd. and positions in other companies.
Xu Jinmei	Admin & HR Director of Irigo (Foshan) Panel Display Co., Ltd.
Yang Yuanjiang	(former) General Manager of Irigo Group
Zhang Dongling	Operation and Management Director of Irigo (Foshan) Panel Display Co., Ltd.
Zhang Jiming	General Manager of Irigo (Foshan) Panel Display Co., Ltd. and positions in other entities
Zhang Wenkai	Deputy General Counsel of Irigo Group

# Attachment B



**Carter, Tom**

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**From:** Matthew Heaphy <mheaphy@saveri.com>  
**Sent:** Thursday, September 7, 2023 2:57 PM  
**To:** Taladay, John; Werbel, Evan; Carter, Tom; Lucarelli, Drew;  
kaylee.yang@nortonrosefulbright.com; Geraldine W. Young  
**Cc:** vrw@judgewalker.com; Tanveer Singh; Rick Saveri; Geoff Rushing; David Hwu; Mario Alioto; Lauren Capurro; Dan Birkhaeuser; Alan Plutzik  
**Subject:** In re Cathode Ray Tube (CRT) Antitrust Litigation – MDL No. 1917, Master File No. 07-CV-5944-JST  
**Attachments:** Plaintiffs Su Search Terms.xlsx

[EXTERNAL EMAIL]

Counsel:

On behalf of DPPs and IPPs, attached please find Plaintiffs' search terms provided pursuant to the Special Master's Second Interim Report & Recommendation on Plaintiffs' Motion for Discovery Sanctions, dated September 1, 2023 (ECF No. 6275) (the "Order").

Plaintiffs request that Baker Botts provide a list of all additional search terms it intends to use in its compliance with the Order.

Thank you.

Matthew Heaphy  
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San Francisco, CA 94111  
mheaphy@saveri.com  
Telephone: (415) 217-6810  
Facsimile: (415) 217-6813

Search Term	Comment	Source
邀请函	Invitation Letter	IRI-SU-000045 CONFIDENTIAL
加州	California	IRI-SU-000045 CONFIDENTIAL
联邦法院	Federal Court	IRI-SU-000045 CONFIDENTIAL
王昭杰	Wang Zhaojie	IRI-SU-000045 CONFIDENTIAL
苏晓华	Su Xiaohua	IRI-SU-000045 CONFIDENTIAL
Xiaohua		IRI-SU-000133 CONFIDENTIAL
闫云龙	Yan Yunlong	IRI-SU-000045 CONFIDENTIAL
张文凯	Zhang Wenkai	IRI-SU-000045 CONFIDENTIAL
马丁	Ma Ding	IRI-SU-000045 CONFIDENTIAL
	Su Xiaohua's ID number	IRI-SU-000045 CONFIDENTIAL
"100751"	Su Xiaohua's Employee number	IRI-CRT-00031561
证人	Witness	IRI-SU-000045 CONFIDENTIAL
作证	Testify	IRI-SU-000045 CONFIDENTIAL
澳门	Macau	IRI-SU-000045 CONFIDENTIAL
<a href="mailto:sxh@ch.com.cn">sxh@ch.com.cn</a>	Su's work email	IRI-SU-000052 CONFIDENTIAL
zhangwenkai0713	Zhang's email ID	IRI-SU-000052 CONFIDENTIAL
[All emails, email handles, and IDs used in WeChat and other communication platforms of the individuals named in this list]		
承诺书	<b>Declaration</b> of personnel traveling abroad	IRI-SU-000052 CONFIDENTIAL
苏总	GM Su	IRI-SU-000052 CONFIDENTIAL
CRT		IRI-SU-000129 CONFIDENTIAL
反垄断	Antitrust	IRI-SU-000129 CONFIDENTIAL
诉讼	Litigation	IRI-SU-000129 CONFIDENTIAL
取证	deposition	IRI-SU-000129 CONFIDENTIAL
通行证	Travel permit	IRI-SU-000129 CONFIDENTIAL
签注	Visa	IRI-SU-000129 CONFIDENTIAL
赴港澳	to Hong Kong and Macau	IRI-SU-000103 CONFIDENTIAL
百尺竿头	[Zhang Wenkai's WeChat alias]	IRI-SU-000103 CONFIDENTIAL
尚婷婷	Shang Ting Ting	IRI-SU-000129 CONFIDENTIAL
香港	Hong Kong	IRI-SU-000129 CONFIDENTIAL
高倩	Gao Qian	IRI-SU-000130 CONFIDENTIAL
郭泉	Guo Quan	IRI-SU-000130 CONFIDENTIAL
焦润刚	Jiao Rungang	IRI-SU-000130 CONFIDENTIAL
白建刚	Bai Jiangang	IRI-SU-000130 CONFIDENTIAL
总经理	General Manager	IRI-SU-000130 CONFIDENTIAL
董事长	Chairman	IRI-SU-000130 CONFIDENTIAL
司总	Chairman Si	IRI-SU-000131 CONFIDENTIAL
美国法院	American Courts	IRI-SU-000131 CONFIDENTIAL
证据	Evidence	IRI-SU-000131 CONFIDENTIAL
法律事务	Legal Affairs	IRI-SU-000131 CONFIDENTIAL
领导	Leadership	IRI-SU-000132 CONFIDENTIAL
法务	Legal Affairs	IRI-SU-000132 CONFIDENTIAL
司云聪	Si Yuncong	IRI-SU-000137 CONFIDENTIAL
阳元江	Yang Yuanjiang	IRI-SU-000137 CONFIDENTIAL
包勇	Bao Yong	IRI-SU-000137 CONFIDENTIAL
石峰	Shi Feng	IRI-SU-000137 CONFIDENTIAL
人力资源部	Human Resources Department	IRI-SU-000137 CONFIDENTIAL
专题会	Special Topic Meeting	IRI-SU-000137 CONFIDENTIAL
离岗	Depart from Post	IRI-SU-000137 CONFIDENTIAL
提前	ahead of time	IRI-SU-000137 CONFIDENTIAL
实业	IRICO Group <b>Industrial</b> Ltd.	IRI-SU-000137 CONFIDENTIAL

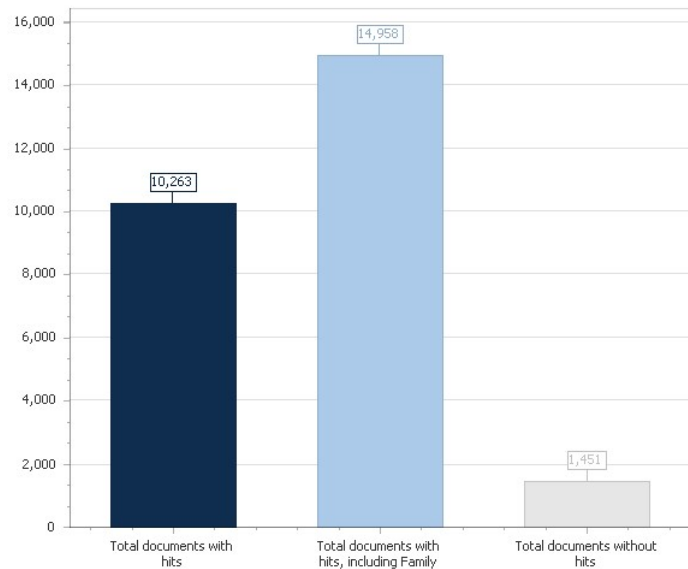
华南	Southern China	IRI-SU-000137 CONFIDENTIAL
绩效考评办法	Irico Group Ltd. <b>Method for Managing and Evaluating Performance</b> of Managers	IRI-SU-000137 CONFIDENTIAL
辞职	Quit	IRI-SU-000141 CONFIDENTIAL
申请	Application	IRI-SU-000141 CONFIDENTIAL
拖	Delay	
延	Postpone	
缓	Postpone	
慢	Slow (to slow)	
借口	Excuse	
藉口	Excuse	
彩管	CRT	
配合	Cooperate	
退休	Retire	
返聘	Rehire	
调岗	Transfer jobs	
顾问	Consultant	
劳务	Labor Contract	
离职	Depart from Post	
解除	Dissolve	
劳动关系	Relationship of Employment	
保险	Insurance	
年金	Pension	IRI-CRT-00007138
个人账户	Personal Account (Pension)	IRI-CRT-00007138
奖励	Reward	IRI-CRT-00007138
养老	Retirement	IRI-CRT-00007148
薪金	Salary	
补贴	Allowance	
绩效	Performance	
奖金	Bonus	

# Attachment C



## Irico Search Terms Report

**Report Name:** 100923 Plaintiffs' Terms Email Server Data for All Custodian  
**Searchable Set:** 0237 Keyword Search Scope of Email Server on All



### Results Summary

Documents in searchable set	Total documents with hits	Total documents with hits, including Family	Total documents without hits
16409	10263	14958	1451

### Terms Summary

Term	Documents with hits	Documents with hits, including Family	Unique hits	Translation/Note
"100751"	3	60	0	Su Xiaohua's employee number
[REDACTED]	17	45	0	Su Xiaohua's ID number
bai	36	244	1	Bai Jiangang's email ID
baoyong	241	261	184	Bao Yong's email ID
CRT	1,263	2,547	357	
gqian	678	2,040	380	Gao Qian's email ID
gquan	779	1,262	587	Guo Quan's email ID
jiaorg	3	9	0	Jiao Rungang's email ID
mad	125	479	1	Ma Ding's email ID
mail(sxh@ch.com.cn)	833	1,273	0	Su Xiaohua's work email
shangtt123	10	32	0	Shang Tingting's email ID
shf	152	326	57	Shi Feng's email ID
sxh	833	1,273	0	Su Xiaohua's email ID
wzj-xs	20	76	0	Wang Zhaojie's email ID
Xiaohua	190	756	1	
yanyunlong	1,120	2,771	1	Yan Yunlong's email ID
zhangwenkai0713	2,660	8,842	346	Zhang's email ID
专题会	52	396	0	Special Topic Meeting
个人账户	65	217	19	Personal Account (Pension)
人力资源部	295	1,702	14	Human Resources Department
作证	550	1,260	0	testify
保险	440	2,644	11	Insurance
借口	2	4	0	Excuse
养老	364	1,697	0	Retirement
加州	45	128	0	California
劳务	453	2,026	76	Labor Contract
劳动关系	455	1,117	0	Relationship of Employment

Term	Documents with hits	Documents with hits, including Family	Unique hits	Translation/Note
包勇	57	81	0	Bao Yong
华南	56	234	2	Southern China
反垄断	551	1,537	0	Antitrust
取证	105	390	3	deposition
司云聪	671	2,881	114	Si Yuncong
司总	737	3,416	50	Chairman Si
奖励	233	948	15	Reward
奖金	358	1,005	2	Bonus
实业	771	3,324	79	Industry
尚婷婷	12	37	0	Shang Ting Ting
年金	45	331	0	Pension
延	1,706	6,069	148	Postpone
张文凯	1,999	6,119	0	Zhang Wenkai
彩管	396	2,651	20	CRT
总经理	1,256	4,415	75	General Manager
慢	75	566	0	Slow (to slow)
承诺书	108	365	5	Declaration of personnel traveling abroad
拖	270	1,840	73	Delay
提前	466	3,126	20	ahead of time
法务	141	1,370	3	Legal Affairs
法律事务	894	3,143	3	Legal Affairs
澳门	227	755	0	Macau
焦润刚	12	35	0	Jiao Rungang
王昭杰	244	926	0	Wang Zhaojie
申请	1,470	5,668	237	Application
白建刚	31	204	0	Bai Jiangang
百尺竿头	3	9	0	Zhang Wenkai's WeChat alias
石峰	133	385	1	Shi Feng
离岗	73	268	1	Depart from Post
离职	680	1,895	5	Depart from Post
签证	19	86	0	Visa
绩效	440	913	19	Performance
绩效考核办法	41	49	0	Method for Managing and Evaluating Performance of Managers
缓	257	1,189	8	Postpone
美国法院	58	101	0	American Courts
联邦法院	9	16	0	federal court
苏总	209	510	0	GM Su
苏晓华	299	1,019	0	Su Xiaohua
董事长	817	3,687	13	Chairman
薪金	196	733	0	Salary
藉口	0	0	0	Excuse
补贴	489	1,795	33	Allowance
解除	497	1,643	3	Dissolve
证人	614	1,443	1	witness
证据	1,336	3,546	0	Evidence
诉讼	1,221	3,271	25	Litigation
调岗	5	7	0	Transfer jobs
赴港澳	14	78	0	to Hong Kong and Macau
辞职	138	583	1	Quit
返聘	20	310	0	Rehire
退休	642	2,776	24	Retire
通行证	77	255	0	Travel permit
邀请函	69	126	9	invitation letter
郭泉	99	262	0	Guo Quan

Term	Documents with hits	Documents with hits, including Family	Unique hits	Translation/Note
配合	664	3,456	13	Cooperate
闫云龙	994	2,576	0	Yan Yunlong
阳元江	78	126	1	Yang Yuanjiang
顾问	775	1,732	9	Consultant
领导	1,405	4,567	130	Leadership
香港	1,730	4,574	267	Hong Kong
马丁	160	574	0	Ma Ding
高倩	222	582	1	Gao Qian

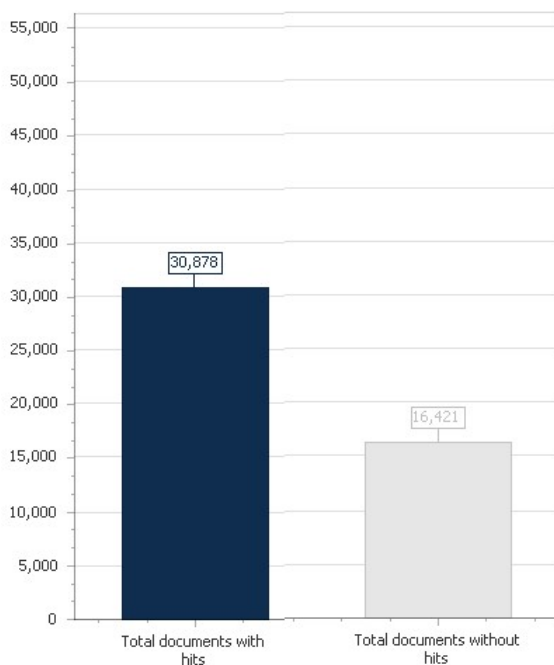
# Attachment D





## Irico Search Terms Report

Report Name: 100923 Plaintiffs' Terms Terms on BM  
Data



### Results Summary

Documents in searchable set	Total documents with hits	Total documents without hits
56325	30878	16421

### Terms Summary

Term	Documents with hits	Unique hits	Translation/Note
"100751"	232	0	Su Xiaohua's employee number
[REDACTED]	82	1	Su Xiaohua's ID number
bai	4	0	Bai Jiangang's email ID
baoyong	1	0	Bao Yong's email ID
CRT	571	36	
gqian	13	3	Gao Qian's email ID
gquan	4	1	Guo Quan's email ID
jiaorg	4	0	Jiao Rungang's email ID
mad	4	0	Ma Ding's email ID
mail(sxh@ch.com.cn)	7	0	Su Xiaohua's work email
shangtt123	8	0	Shang Tingting's email ID
shf	6	0	Shi Feng's email ID
sxh	8	0	Su Xiaohua's email ID
wzj-xs	1	0	Wang Zhaojie's email ID
Xiaohua	8	0	
yanyunlong	17	0	Yan Yunlong's email ID
zhangwenkai0713	21	0	Zhang's email ID
专题会	906	31	Special Topic Meeting
个人账户	30	0	Personal Account (Pension)

Term	Documents with hits	Unique hits	Translation/Note
人力资源部	3,631	257	Human Resources Department
作证	401	7	testify
保险	1,448	49	Insurance
借口	26	0	Excuse
养老	762	29	Retirement
加州	85	0	California
劳务	1,980	109	Labor Contract
劳动关系	672	6	Relationship of Employment
包勇	1,447	517	Bao Yong
华南	2,010	347	Southern China
反垄断	544	12	Antitrust
取证	237	16	deposition
司云聪	1,276	73	Si Yuncong
司总	2,543	81	Chairman Si
奖励	2,657	90	Reward
奖金	1,503	7	Bonus
实业	5,448	843	Industry
尚婷婷	345	76	Shang Ting Ting
年金	268	11	Pension
延	2,784	188	Postpone
张文凯	1,633	508	Zhang Wenkai
彩管	395	6	CRT
总经理	5,470	117	General Manager
慢	315	40	Slow (to slow)
承诺书	376	34	Declaration of personnel traveling abroad
拖	642	33	Delay
提前	2,021	252	ahead of time
法务	767	35	Legal Affairs
法律事务	1,108	7	Legal Affairs
澳门	296	5	Macau
焦润刚	988	166	Jiao Rungang
王昭杰	440	5	Wang Zhaojie
申请	3,803	562	Application
白建刚	873	109	Bai Jiangang
百尺竿头	7	0	Zhang Wenkai's WeChat alias
石峰	3,095	1,357	Shi Feng
离岗	1,307	8	Depart from Post
离职	993	48	Depart from Post
签证	112	1	Visa
绩效	3,866	109	Performance
绩效考评办法	522	0	Method for Managing and Evaluating Performance of Managers
缓	1,007	147	Postpone
美国法院	79	0	American Courts
联邦法院	44	0	federal court
苏总	544	98	GM Su
苏晓华	2,638	297	Su Xiaohua

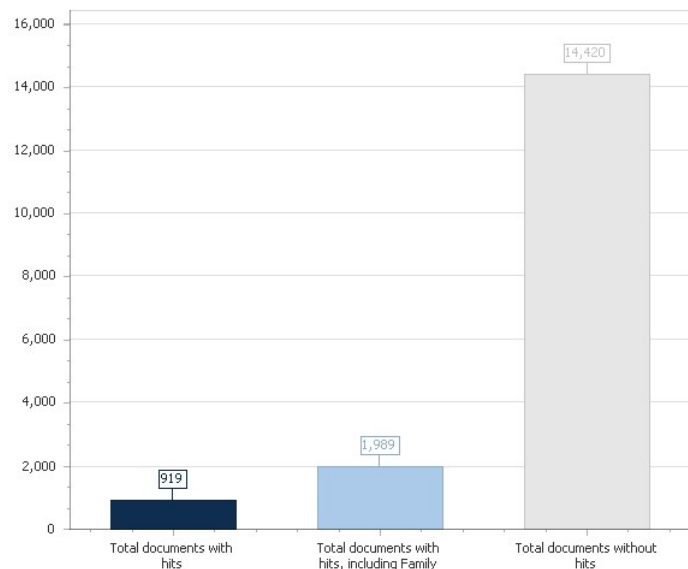
Term	Documents with hits	Unique hits	Translation/Note
董事长	2,281	21	Chairman
薪金	937	0	Salary
藉口	0	0	Excuse
补贴	2,143	56	Allowance
解除	1,964	36	Dissolve
证人	380	5	witness
证据	607	11	Evidence
诉讼	1,506	43	Litigation
调岗	78	0	Transfer jobs
赴港澳	43	0	to Hong Kong and Macau
辞职	555	0	Quit
返聘	746	0	Rehire
退休	2,894	72	Retire
通行证	227	5	Travel permit
邀请函	101	3	invitation letter
郭泉	1,474	517	Guo Quan
配合	2,521	132	Cooperate
闫云龙	854	43	Yan Yunlong
阳元江	1,025	188	Yang Yuanjiang
顾问	1,481	13	Consultant
领导	12,985	3,029	Leadership
香港	1,259	176	Hong Kong
马丁	248	17	Ma Ding
高倩	3,069	1,921	Gao Qian

# Attachment E



## Irico Search Terms Report

**Report Name:** 100923 Proposed Terms Terms Searches on Email Sever Data  
**Searchable Set:** 0237 Keyword Search Scope of Email Server on All



### Results Summary

Documents in searchable set	Total documents with hits	Total documents with hits, including Family	Total documents without hits
16409	919	1989	14420

### Terms Summary

Term	Documents with hits	Documents with hits, including Family	Unique hits	Translation/Note
"4月7日" AND (苏晓华 OR "Xiaohua" OR OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	19	79	0	[variations of potentially relevant dates]
"5月25日" AND (苏晓华 OR "Xiaohua" OR OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	33	59	0	[variations of potentially relevant dates]
"6月17日" AND (苏晓华 OR "Xiaohua" OR OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	27	130	0	[variations of potentially relevant dates]
"交接" AND (苏晓华 OR "Xiaohua" OR OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	12	68	0	handover
"任职年龄上限" AND (苏晓华 OR "Xiaohua" OR OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	1	3	0	upper age limit for appointment
"作证" AND (苏晓华 OR "Xiaohua" OR OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	169	377	4	testify
"免职" AND (苏晓华 OR "Xiaohua" OR OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	25	25	0	removal

Term	Documents with hits	Documents with hits, including Family	Unique hits	Translation/Note
"内退" AND (苏晓华 OR "Xiaohua" OR ██████████ OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	35	47	0	retreat
"尊坤" AND (苏晓华 OR "Xiaohua" OR ██████████ OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	2	5	0	Zunkun
"尊坤" AND (苏晓华 OR "Xiaohua" OR ██████████ OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	1	2	0	Zunshen
"报告" AND (苏晓华 OR "Xiaohua" OR ██████████ OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	137	740	0	report
"推荐" AND (苏晓华 OR "Xiaohua" OR ██████████ OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	29	106	1	recommend
"新单位" AND (苏晓华 OR "Xiaohua" OR ██████████ OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	0	0	0	new unit
"新职位" AND (苏晓华 OR "Xiaohua" OR ██████████ OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	0	0	0	new position
"最后工作日" AND (苏晓华 OR "Xiaohua" OR ██████████ OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	1	4	0	last day
"深圳" AND (苏晓华 OR "Xiaohua" OR ██████████ OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	103	349	2	Shenzhen
"离任" AND (苏晓华 OR "Xiaohua" OR ██████████ OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	27	66	0	leaving office
"离岗" AND (苏晓华 OR "Xiaohua" OR ██████████ OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	39	57	0	leaving post
"终止" AND (苏晓华 OR "Xiaohua" OR ██████████ OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	33	198	0	termination
"美国" AND (苏晓华 OR "Xiaohua" OR ██████████ OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	126	445	0	United States
"老母亲" AND (苏晓华 OR "Xiaohua" OR ██████████ OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	0	0	0	old mother

Term	Documents with hits	Documents with hits, including Family	Unique hits	Translation/Note
"证人" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	134	317	0	witness
"辞职" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	73	172	0	resign
"退休" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	80	407	0	retire
("4-7" OR "4.7") AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	37	204	5	[variations of potentially relevant dates]
("5-25" OR "5.25") AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	37	287	3	[variations of potentially relevant dates]
("6-17" OR "6.17") AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	23	129	4	[variations of potentially relevant dates]
bai AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	1	4	0	Bai Jiangang's email ID
baoyong AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	0	0	0	Bao Yong's email ID
CRT AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	202	678	40	
gqian AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	0	0	0	Gao Qian's email ID
gquan AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	0	0	0	Guo Quan's email ID
jiaorg AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	0	0	0	Jiao Rungang's email ID
mad AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	23	57	0	Ma Ding's email ID
shangtt123 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	0	0	0	Shang Tingting's email ID

Term	Documents with hits	Documents with hits, including Family	Unique hits	Translation/Note
shf AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	0	0	0	Shi Feng's email ID
wzj-xs AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	17	47	0	Wang Zhaojie's email ID
yanyunlong AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	233	708	2	Yan Yunlong's email ID
zhangwenkai0713 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	269	705	1	Zhang's email ID
专题会 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	3	9	0	Special Topic Meeting
个人账户 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	9	15	2	Personal Account (Pension)
人力资源部 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	84	409	0	Human Resources Department
保险 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	38	205	1	Insurance
借口 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	0	0	0	Excuse
养老 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	24	62	0	Retirement
加州 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	3	7	0	California
劳务 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	33	206	0	Labor Contract
劳动关系 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	39	162	0	Relationship of Employment
包勇 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	28	33	0	Bao Yong



Term	Documents with hits	Documents with hits, including Family	Unique hits	Translation/Note
华南 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	16	100	0	Southern China
反垄断 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	106	408	0	Antitrust
取证 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	14	67	0	deposition
司云聪 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	97	456	0	Si Yuncong
司总 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	84	349	0	Chairman Si
奖励 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	26	101	0	Reward
奖金 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	6	75	0	Bonus
实业 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	77	289	0	Industry
尚婷婷 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	5	15	0	Shang Ting Ting
年金 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	3	31	0	Pension
延 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	95	309	0	Postpone
张文凯 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	279	865	0	Zhang Wenkai
彩管 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	42	334	0	CRT
总经理 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	88	547	0	General Manager

Term	Documents with hits	Documents with hits, including Family	Unique hits	Translation/Note
慢 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	1	2	0	Slow (to slow)
承诺书 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	30	58	3	Declaration of personnel traveling abroad
拖 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	10	40	0	Delay
提前 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	71	123	0	ahead of time
法务 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	32	248	1	Legal Affairs
法律事务 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	201	601	0	Legal Affairs
澳门 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	89	258	0	Macau
焦润刚 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	5	15	0	Jiao Rungang
王昭杰 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	146	655	2	Wang Zhaojie
申请 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	105	350	3	Application
白建刚 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	11	52	0	Bai Jiangang
百尺竿头 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	0	0	0	[Zhang Wenkai's WeChat alias]
石峰 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	32	46	0	Shi Feng
离职 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	143	555	1	Depart from Post

Term	Documents with hits	Documents with hits, including Family	Unique hits	Translation/Note
签证 AND (苏晓华 OR "Xiaohua" OR OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	4	27	0	Visa
绩效 AND (苏晓华 OR "Xiaohua" OR OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	34	82	1	Performance
绩效考评办法 AND (苏晓华 OR "Xiaohua" OR OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	30	37	0	Method for Managing and Evaluating Performance of Managers
缓 AND (苏晓华 OR "Xiaohua" OR OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	33	173	0	Postpone
联邦法院 AND (苏晓华 OR "Xiaohua" OR OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	3	7	0	federal court
董事长 AND (苏晓华 OR "Xiaohua" OR OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	82	545	0	Chairman
薪金 AND (苏晓华 OR "Xiaohua" OR OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	0	0	0	Salary
藉口 AND (苏晓华 OR "Xiaohua" OR OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	0	0	0	Excuse
补贴 AND (苏晓华 OR "Xiaohua" OR OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	31	191	3	Allowance
解除 AND (苏晓华 OR "Xiaohua" OR OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	42	135	0	Dissolve
证据 AND (苏晓华 OR "Xiaohua" OR OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	275	802	0	Evidence
诉讼 AND (苏晓华 OR "Xiaohua" OR OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	151	607	0	Litigation
调岗 AND (苏晓华 OR "Xiaohua" OR OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	0	0	0	Transfer jobs
赴港澳 AND (苏晓华 OR "Xiaohua" OR OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	9	34	0	to Hong Kong and Macau

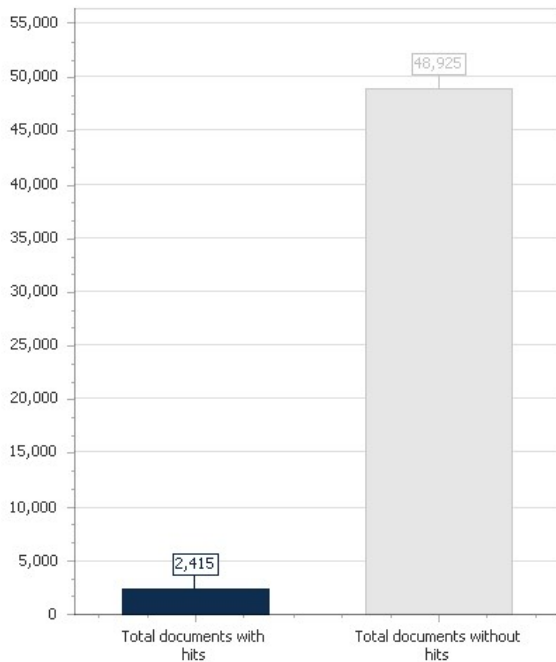
Term	Documents with hits	Documents with hits, including Family	Unique hits	Translation/Note
返聘 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	2	5	0	Rehire
通行证 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	32	75	0	Travel permit
邀请函 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	21	30	1	invitation letter
郭泉 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	5	15	0	Guo Quan
配合 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	107	219	0	Cooperate
闫云龙 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	231	842	7	Yan Yunlong
阳元江 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	29	38	0	Yang Yuanjiang
顾问 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	62	188	0	Consultant
领导 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	113	485	1	Leadership
香港 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	494	807	362	Hong Kong
马丁 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	43	100	0	Ma Ding
高倩 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	0	0	0	Gao Qian

# Attachment F



## Irico Search Terms Report

Report Name: 100923 Proposed Terms on BM Data



### Results Summary

Documents in searchable set	Total documents with hits	Total documents without hits
56325	2415	48925

### Terms Summary

Term	Documents with hits	Unique hits	Translation/Note
"4月7日" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	12	0	[variations of potentially relevant dates]
"5月25日" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	19	0	[variations of potentially relevant dates]
"6月17日" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	35	0	[variations of potentially relevant dates]
"交接" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	78	0	handover
"任职年龄上限" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	13	0	upper age limit for appointment

Term	Documents with hits	Unique hits	Translation/Note
"作证" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	50	0	testify
"免职" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	45	0	removal
"内退" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	699	0	retreat
"尊坤" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	0	0	Zunkun
"尊绅" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	0	0	Zunshen
"报告" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	275	13	report
"推荐" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	136	4	recommend
"新单位" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	33	0	new unit
"新职位" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	0	0	new position
"最后工作日" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	0	0	last day
"深圳" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	293	5	Shenzhen
"离任" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	106	0	leaving office

Term	Documents with hits	Unique hits	Translation/Note
"离岗" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	629	2	leaving post
"终止" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	385	0	termination
"美国" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	28	0	United States
"老母亲" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	2	0	old mother
"证人" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	26	0	witness
"辞职" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	60	0	resign
"退休" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	863	1	retire
("4-7" OR "4.7") AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	144	0	[variations of potentially relevant dates]
("5-25" OR "5.25") AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	8	0	[variations of potentially relevant dates]
("6-17" OR "6.17") AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	22	0	[variations of potentially relevant dates]
bai AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	1	0	Bai Jiangang's email ID
baoyong AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	1	0	Bao Yong's email ID



Term	Documents with hits	Unique hits	Translation/Note
CRT AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	22	6	
gqian AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	1	0	Gao Qian's email ID
gquan AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	1	0	Guo Quan's email ID
jiaorg AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	1	0	Jiao Rungang's email ID
mad AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	1	0	Ma Ding's email ID
shangtt123 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	1	0	Shang Tingting's email ID
shf AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	1	0	Shi Feng's email ID
wzj-xs AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	1	0	Wang Zhaojie's email ID
yanyunlong AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	1	0	Yan Yunlong's email ID
zhangwenkai0713 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	1	0	Zhang's email ID
专题会 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	87	6	Special Topic Meeting
个人账户 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	4	0	Personal Account (Pension)

Term	Documents with hits	Unique hits	Translation/Note
人力资源部 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	132	0	Human Resources Department
保险 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	408	6	Insurance
借口 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	3	0	Excuse
养老 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	382	7	Retirement
加州 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	4	0	California
劳务 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	906	48	Labor Contract
劳动关系 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	247	0	Relationship of Employment
包勇 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	34	0	Bao Yong
华南 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	550	36	Southern China
反垄断 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	37	4	Antitrust
取证 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	47	0	deposition
司云聪 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	49	0	Si Yuncong

Term	Documents with hits	Unique hits	Translation/Note
司总 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	119	2	Chairman Si
奖励 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	597	5	Reward
奖金 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	741	0	Bonus
实业 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	648	68	Industry
尚婷婷 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	12	0	Shang Ting Ting
年金 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	38	1	Pension
延 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	199	4	Postpone
张文凯 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	54	2	Zhang Wenkai
彩管 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	20	0	CRT
总经理 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	687	11	General Manager
慢 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	16	2	Slow (to slow)
承诺书 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	53	1	Declaration of personnel traveling abroad

Term	Documents with hits	Unique hits	Translation/Note
拖 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	77	0	Delay
提前 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	118	5	ahead of time
法务 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	106	6	Legal Affairs
法律事务 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	73	0	Legal Affairs
澳门 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	52	0	Macau
焦润刚 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	9	0	Jiao Rungang
王昭杰 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	53	0	Wang Zhaojie
申请 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	310	19	Application
白建刚 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	20	0	Bai Jiangang
百尺竿头 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	0	0	[Zhang Wenkai's WeChat alias]
石峰 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	49	2	Shi Feng
离职 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	84	0	Depart from Post

Term	Documents with hits	Unique hits	Translation/Note
签证 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	41	0	Visa
绩效 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	846	5	Performance
绩效考核办法 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	22	0	Method for Managing and Evaluating Performance of Managers
缓 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	116	0	Postpone
联邦法院 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	3	0	federal court
董事长 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	125	1	Chairman
薪金 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	602	0	Salary
藉口 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	0	0	Excuse
补贴 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	767	3	Allowance
解除 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	412	1	Dissolve
证据 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	98	0	Evidence
诉讼 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	187	0	Litigation

Term	Documents with hits	Unique hits	Translation/Note
调岗 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	22	0	Transfer jobs
赴港澳 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	7	0	to Hong Kong and Macau
返聘 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	407	0	Rehire
通行证 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	44	0	Travel permit
邀请函 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	8	0	invitation letter
郭泉 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	24	0	Guo Quan
配合 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	222	13	Cooperate
闫云龙 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	54	2	Yan Yunlong
阳元江 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	43	0	Yang Yuanjiang
顾问 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	482	0	Consultant
领导 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	964	48	Leadership
香港 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	191	1	Hong Kong

Term	Documents with hits	Unique hits	Translation/Note
马丁 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	18	0	Ma Ding
高倩 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	21	0	Gao Qian

# Attachment G



**Carter, Tom**

---

**From:** Lauren Russell <LaurenRussell@TATP.com>  
**Sent:** Friday, October 6, 2023 8:00 PM  
**To:** Werbel, Evan; Carter, Tom; Matthew Heaphy; Rick Saveri  
**Cc:** Geoff Rushing; David Hwu; Mario Alioto; Dan Birkhaeuser; Alan Plutzik; Taladay, John; Lucarelli, Drew; kaylee.yang@nortonrosefulbright.com; Geraldine W. Young  
**Subject:** RE: In re Cathode Ray Tube (CRT) Antitrust Litigation – MDL No. 1917, Master File No. 07-CV-5944-JST

[EXTERNAL EMAIL]

Evan:

We have discussed and considered your request that Plaintiffs agree to your proposed limitations of our search terms, but we cannot agree to your request. We are not able to test your proposed limiters or have any visibility into the results of the searches to know whether responsive documents are being missed.

Judge Walker's Order requires Baker Botts to search for and "produce to plaintiffs *all* non-privileged documents responsive to the Su Order and this order and a privilege log for any withheld documents." Interim Order at 9 (emphasis added). Plaintiffs cannot modify this requirement. Judge Walker gave Plaintiffs the opportunity to propose search terms, which we did, but ultimately it is Baker Botts' responsibility to ensure that whatever search methodologies are used, all responsive documents are captured.

As for your requested extension of time to comply with Judge Walker's Order, that request is more appropriately directed to Judge Walker. However, Plaintiffs note that you were aware of Plaintiffs' search terms as well as any Chinese government review requirements when you requested the three-week extension. In addition, given that you are only looking for documents relating to Mr. Su's resignation, many relevant documents should be identifiable without search terms. Any such documents should be produced by the current deadline, along with the other information ordered by Judge Walker that does not involve review of search results.

Regards,

Lauren

Lauren C. Capurro (Russell)  
Attorney at Law  
Trump, Alioto, Trump & Prescott, LLP  
Telephone: (415) 860-5051  
E-mail: [lauren russell@tatp.com](mailto:lauren russell@tatp.com)

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---

**From:** Werbel, Evan <evan.werbel@bakerbotts.com>  
**Sent:** Friday, October 6, 2023 3:37 PM  
**To:** Carter, Tom <Tom.Carter@BakerBotts.com>; Matthew Heaphy <mheaphy@saveri.com>; Rick Saveri <rick@saveri.com>; Lauren Russell <LaurenRussell@TATP.com>  
**Cc:** Geoff Rushing <geoff@saveri.com>; David Hwu <dhwu@saveri.com>; Mario Alioto <MAlioto@TATP.com>; Dan

Birkhaeuser <[dbirkhaeuser@bramsonplutzik.com](mailto:dbirkhaeuser@bramsonplutzik.com)>; Alan Plutzik <[aplutzik@bramsonplutzik.com](mailto:aplutzik@bramsonplutzik.com)>; Taladay, John <[john.taladay@bakerbotts.com](mailto:john.taladay@bakerbotts.com)>; Lucarelli, Drew <[drew.lucarelli@bakerbotts.com](mailto:drew.lucarelli@bakerbotts.com)>; kaylee.yang@nortonrosefulbright.com; Geraldine W. Young <[geraldine.young@nortonrosefulbright.com](mailto:geraldine.young@nortonrosefulbright.com)>  
**Subject:** RE: In re Cathode Ray Tube (CRT) Antitrust Litigation – MDL No. 1917, Master File No. 07-CV-5944-JST

Matt and all, As requested, attached is a list of the 15 custodians that we have been discussing along with information on their relevant positions and entities. We are also looking into the other questions that you raised during our meet and confer today. The preliminary response that we received on deduplication of emails and internal texts is that all the search results have been deduped, but we are confirming further and will get back to you on that issue and the others discussed.

We look forward to hearing from Plaintiffs on the key word searches and on the request for an extension.

Thanks,  
Evan

**Evan J. Werbel**  
**Baker Botts L.L.P.**  
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---

**From:** Carter, Tom <[Tom.Carter@BakerBotts.com](mailto:Tom.Carter@BakerBotts.com)>

**Sent:** Thursday, October 5, 2023 4:43 PM

**To:** Matthew Heaphy <[mheaphy@saveri.com](mailto:mheaphy@saveri.com)>; Werbel, Evan <[evan.werbel@bakerbotts.com](mailto:evan.werbel@bakerbotts.com)>; Rick Saveri <[rick@saveri.com](mailto:rick@saveri.com)>; Lauren Capurro <[LaurenRussell@TATP.com](mailto:LaurenRussell@TATP.com)>

**Cc:** Geoff Rushing <[geoff@saveri.com](mailto:geoff@saveri.com)>; David Hwu <[dhwu@saveri.com](mailto:dhwu@saveri.com)>; Mario Alioto <[MAlioto@TATP.com](mailto:MAlioto@TATP.com)>; Dan Birkhaeuser <[dbirkhaeuser@bramsonplutzik.com](mailto:dbirkhaeuser@bramsonplutzik.com)>; Alan Plutzik <[aplutzik@bramsonplutzik.com](mailto:aplutzik@bramsonplutzik.com)>; Taladay, John <[john.taladay@bakerbotts.com](mailto:john.taladay@bakerbotts.com)>; Lucarelli, Drew <[drew.lucarelli@bakerbotts.com](mailto:drew.lucarelli@bakerbotts.com)>; kaylee.yang@nortonrosefulbright.com; Geraldine W. Young <[geraldine.young@nortonrosefulbright.com](mailto:geraldine.young@nortonrosefulbright.com)>

**Subject:** RE: In re Cathode Ray Tube (CRT) Antitrust Litigation – MDL No. 1917, Master File No. 07-CV-5944-JST

Matt, please see attached. The terms added by Irico (not including duplicative terms with Plaintiffs' list) are marked in blue at the bottom of the list.

---

**From:** Matthew Heaphy <[mheaphy@saveri.com](mailto:mheaphy@saveri.com)>

**Sent:** Thursday, October 5, 2023 3:30 PM

**To:** Carter, Tom <[Tom.Carter@BakerBotts.com](mailto:Tom.Carter@BakerBotts.com)>; Werbel, Evan <[evan.werbel@bakerbotts.com](mailto:evan.werbel@bakerbotts.com)>; Rick Saveri <[rick@saveri.com](mailto:rick@saveri.com)>; Lauren Capurro <[LaurenRussell@TATP.com](mailto:LaurenRussell@TATP.com)>

**Cc:** Geoff Rushing <[geoff@saveri.com](mailto:geoff@saveri.com)>; David Hwu <[dhwu@saveri.com](mailto:dhwu@saveri.com)>; Mario Alioto <[MAlioto@TATP.com](mailto:MAlioto@TATP.com)>; Dan Birkhaeuser <[dbirkhaeuser@bramsonplutzik.com](mailto:dbirkhaeuser@bramsonplutzik.com)>; Alan Plutzik <[aplutzik@bramsonplutzik.com](mailto:aplutzik@bramsonplutzik.com)>; Taladay, John <[john.taladay@bakerbotts.com](mailto:john.taladay@bakerbotts.com)>; Lucarelli, Drew <[drew.lucarelli@bakerbotts.com](mailto:drew.lucarelli@bakerbotts.com)>; kaylee.yang@nortonrosefulbright.com; Geraldine W. Young <[geraldine.young@nortonrosefulbright.com](mailto:geraldine.young@nortonrosefulbright.com)>

**Subject:** RE: In re Cathode Ray Tube (CRT) Antitrust Litigation – MDL No. 1917, Master File No. 07-CV-5944-JST

[EXTERNAL EMAIL]

Tom:

Per our discussion, could you please provide a list of Irico's additional search terms?

Thanks,  
Matt

---

**From:** Carter, Tom <[Tom.Carter@BakerBotts.com](mailto:Tom.Carter@BakerBotts.com)>

**Sent:** Thursday, October 5, 2023 11:40 AM

**To:** Matthew Heaphy <[mheaphy@saveri.com](mailto:mheaphy@saveri.com)>; Werbel, Evan <[evan.werbel@bakerbotts.com](mailto:evan.werbel@bakerbotts.com)>; Rick Saveri <[rick@saveri.com](mailto:rick@saveri.com)>; Lauren Capurro <[LaurenRussell@TATP.com](mailto:LaurenRussell@TATP.com)>

**Cc:** Geoff Rushing <[geoff@saveri.com](mailto:geoff@saveri.com)>; David Hwu <[dhwu@saveri.com](mailto:dhwu@saveri.com)>; Mario Alioto <[MAlioto@TATP.com](mailto:MAlioto@TATP.com)>; Dan Birkhaeuser <[dbirkhaeuser@bramsonplutzik.com](mailto:dbirkhaeuser@bramsonplutzik.com)>; Alan Plutzik <[aplutzik@bramsonplutzik.com](mailto:aplutzik@bramsonplutzik.com)>; Taladay, John <[john.taladay@bakerbotts.com](mailto:john.taladay@bakerbotts.com)>; Lucarelli, Drew <[drew.lucarelli@bakerbotts.com](mailto:drew.lucarelli@bakerbotts.com)>;

[kaylee.yang@nortonrosefulbright.com](mailto:kaylee.yang@nortonrosefulbright.com); Geraldine W. Young <[geraldine.young@nortonrosefulbright.com](mailto:geraldine.young@nortonrosefulbright.com)>

**Subject:** RE: In re Cathode Ray Tube (CRT) Antitrust Litigation – MDL No. 1917, Master File No. 07-CV-5944-JST

Matt, for discussion on the call at noon Pacific, please see the attached search term hit reports.

Thanks,  
Tom

---

**From:** Matthew Heaphy <[mheaphy@saveri.com](mailto:mheaphy@saveri.com)>

**Sent:** Thursday, October 5, 2023 1:42 PM

**To:** Werbel, Evan <[evan.werbel@bakerbotts.com](mailto:evan.werbel@bakerbotts.com)>; Rick Saveri <[rick@saveri.com](mailto:rick@saveri.com)>; Lauren Capurro <[LaurenRussell@TATP.com](mailto:LaurenRussell@TATP.com)>

**Cc:** Geoff Rushing <[geoff@saveri.com](mailto:geoff@saveri.com)>; David Hwu <[dhwu@saveri.com](mailto:dhwu@saveri.com)>; Mario Alioto <[MAlioto@TATP.com](mailto:MAlioto@TATP.com)>; Dan Birkhaeuser <[dbirkhaeuser@bramsonplutzik.com](mailto:dbirkhaeuser@bramsonplutzik.com)>; Alan Plutzik <[aplutzik@bramsonplutzik.com](mailto:aplutzik@bramsonplutzik.com)>; Taladay, John <[john.taladay@bakerbotts.com](mailto:john.taladay@bakerbotts.com)>; Carter, Tom <[Tom.Carter@BakerBotts.com](mailto:Tom.Carter@BakerBotts.com)>; Lucarelli, Drew <[drew.lucarelli@bakerbotts.com](mailto:drew.lucarelli@bakerbotts.com)>;

[kaylee.yang@nortonrosefulbright.com](mailto:kaylee.yang@nortonrosefulbright.com); Geraldine W. Young

<[geraldine.young@nortonrosefulbright.com](mailto:geraldine.young@nortonrosefulbright.com)>

**Subject:** RE: In re Cathode Ray Tube (CRT) Antitrust Litigation – MDL No. 1917, Master File No. 07-CV-5944-JST

[EXTERNAL EMAIL]

Evan:

Plaintiffs are available today at noon Pacific. Could you please circulate a call-in number?

Best,  
Matt

---

**From:** Werbel, Evan <[evan.werbel@bakerbotts.com](mailto:evan.werbel@bakerbotts.com)>

**Sent:** Wednesday, October 4, 2023 1:10 PM

**To:** Rick Saveri <[rick@saveri.com](mailto:rick@saveri.com)>; Lauren Capurro <[LaurenRussell@TATP.com](mailto:LaurenRussell@TATP.com)>

**Cc:** Geoff Rushing <[geoff@saveri.com](mailto:geoff@saveri.com)>; David Hwu <[dhwu@saveri.com](mailto:dhwu@saveri.com)>; Mario Alioto <[MAlioto@TATP.com](mailto:MAlioto@TATP.com)>; Dan Birkhaeuser <[dbirkhaeuser@bramsonplutzik.com](mailto:dbirkhaeuser@bramsonplutzik.com)>; Alan Plutzik <[aplutzik@bramsonplutzik.com](mailto:aplutzik@bramsonplutzik.com)>; Matthew Heaphy <[mheaphy@saveri.com](mailto:mheaphy@saveri.com)>; Taladay, John <[john.taladay@bakerbotts.com](mailto:john.taladay@bakerbotts.com)>; Carter, Tom <[Tom.Carter@BakerBotts.com](mailto:Tom.Carter@BakerBotts.com)>;

Lucarelli, Drew <[drew.lucarelli@bakerbotts.com](mailto:drew.lucarelli@bakerbotts.com)>; [kaylee.yang@nortonrosefulbright.com](mailto:kaylee.yang@nortonrosefulbright.com); Geraldine W. Young

<[geraldine.young@nortonrosefulbright.com](mailto:geraldine.young@nortonrosefulbright.com)>

**Subject:** In re Cathode Ray Tube (CRT) Antitrust Litigation – MDL No. 1917, Master File No. 07-CV-5944-JST

Lauren and Rick, Are Plaintiffs available tomorrow to meet and confer regarding the search terms for the Su investigation? How about 12:00 Pacific? If that does not work, let us know if there is another time that does.

Thanks,  
Evan

**Evan J. Werbel**

**Baker Botts L.L.P.**

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# DOCUMENT 19

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October 12, 2023

**VIA EMAIL**

The Honorable Vaughn R. Walker  
Law Office of Vaughn R. Walker  
Four Embarcadero Center, Suite 2200  
San Francisco, CA 94111  
vrw@judgewalker.com

Re: *In re Cathode Ray Tube (CRT) Antitrust Litigation* – MDL No. 1917,  
Master File No. 07-CV-5944-JST

Dear Judge Walker:

IPPs and DPPs (together, “Plaintiffs”) respond to Irico’s letter dated October 9, 2023 regarding search terms. In summary, Plaintiffs cannot “agree” to search terms that Irico proposes. Nor should Irico ask Your Honor to “approve” them. The appropriateness of the proposed “Su qualifiers” that Irico proposes can only be tested by examining the documents that were excluded when they were applied. This process has not been performed to Plaintiffs’ knowledge. Much less have the results been provided to Plaintiffs or Your Honor. Nor do the “Su qualifiers” necessarily make sense. For example, they should not be applied to documents collected from Mr. Su’s files.

However, at bottom, this is not a difficult task. Irico is collecting documents related to Mr. Su’s departure. Your Honor’s Order requires a production from a limited time period, with limited custodians involved and discrete topics. Further, the Order requires Irico to collect and produce documents by means other than search terms – which apparently it has – by interviewing custodians, etc. Baker Botts and Irico have had more than ample time to complete this aspect of their search. All responsive documents collected to date should be produced immediately.

In the Interim Report and Recommendation dated September 1, 2003, Your Honor invited Plaintiffs “at their discretion, [to] provide search terms designed to identify responsive documents and information to Baker Botts.” Plaintiffs did so by September 7, 2023, the date specified in the Order.

Irico’s account of the meet and confer process is misleading and demonstrates a strategy of delay. Plaintiffs met and conferred twice with Baker Botts (immediately upon

The Honorable Vaughn R. Walker

10/12/2023

Page 2

their October 4 request – almost one month after the search terms were provided) about the use of the “Su qualifiers” that Irco proposed. Irco informed Plaintiffs that Plaintiffs’ search terms yielded approximately 40,000 documents. Irco explained that its proposed qualifiers yielded only 3,300 documents and asked Plaintiffs to “approve” the modified search terms. Notably, during the meet and confers Baker Botts never took issue with any of Plaintiffs’ search terms. Plaintiffs submit that they were narrowly tailored based on terms that appeared in documents produced in response to Your Honor’s initial order regarding Mr. Su. In fact, Baker Botts informed Plaintiffs that they used Plaintiffs’ search terms as a basis for their own and added to them.

Without more, Plaintiffs cannot “approve” Irco’s use of the proposed qualifiers. Plaintiffs do not know what information is contained in the 36,700 documents excluded by the qualifiers. Nor does Your Honor. It is Baker Botts’ and Irco’s obligation to comply with the Court’s Order. Only Baker Botts and Irco know what documents have been gathered and what documents would be left behind. Only Baker Botts and Irco can examine or perform searches on the excluded documents to evaluate responsiveness.

Plaintiffs note that this is the first time in this litigation that Irco has indicated that a “state secret” review would delay any productions. Indeed, Irco has previously produced documents related to Mr. Su’s departure without indicating any such review was performed.

Given the misplaced and unnecessary invective in Irco’s letter, Plaintiffs can only conclude that the sole purpose is additional delay. On August 21, 2023, Your Honor initially required Irco to produce documents no later than September 22, 2023. ECF No. 6264 at 9. At Irco’s request, Your Honor extended the deadline until October 13, 2023. ECF No. 6325. At a minimum, Irco should be required to produce all responsive documents it has collected to date and all direct communications with Mr. Su during the relevant time period by October 13. As for the remaining documents, Irco should determine the responsiveness of the documents eliminated by its use of qualifiers and produce documents responsive to Your Honor’s order on October 13 or whatever brief extension Your Honor grants.

Very truly yours,

*/s/ R. Alexander Saveri*

R. Alexander Saveri  
Lead Counsel for Direct Purchaser Plaintiffs

*/s/ Lauren C. Capurro*

Lauren C. Capurro  
Lead Counsel for Indirect Purchaser Plaintiffs

The Honorable Vaughn R. Walker

10/12/2023

Page 3

Cc: Tanveer Singh (tanveer.singh@fedarb.com)  
John M. Taladay (john.taladay@bakerbotts.com)  
Evan J. Werbel (evan.werbel@bakerbotts.com)  
Thomas E. Carter (tom.carter@bakerbotts.com)  
Andrew L. Lucarelli (drew.lucarelli@bakerbotts.com)  
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Kaylee Yang (kaylee.yang@nortonrosefulbright.com)



# **DOCUMENT 20**

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October 16, 2023

VIA E-MAIL [VRW@JUDGEWALKER.COM]

John Taladay  
TEL: 2026397909  
FAX: 2026391165  
john.taladay@bakerbotts.com

The Honorable Vaughn R. Walker  
Law Office of Vaughn R. Walker  
Four Embarcadero Center, Suite 2200  
San Francisco, CA 94111

Re: In re Cathode Ray Tube (CRT) Antitrust Litigation, MDL No. 1917, Master File  
No. 07-CV-944-JST

Dear Judge Walker:

Defendants Irico Group Corp. and Irico Display Devices Co., Ltd. (collectively, “Irico”) write with a further update on its compliance with Your Honor’s Interim Reports and Recommendations on Plaintiffs’ Motion for Discovery Sanctions dated August 4, 2023 (ECF No. 6233) (“First Interim Order”) and September 1, 2023 (ECF No. 6275) (“Second Interim Order”) (collectively, “Orders”).

On October 9<sup>th</sup>, Baker Botts submitted a letter updating Your Honor on the status of its efforts, asking Your Honor to approve modified search terms and requesting a brief extension for the compliance with the Orders. Plaintiffs did not respond with their short letter submission until the evening of October 12<sup>th</sup>. On October 13<sup>th</sup>, the scheduled compliance date, Tanveer Singh informed the Parties that Your Honor was out of town and may not be able to address the issues until today.

Irico and Baker Botts continue to work diligently to comply with each requirement in Your Honor’s Orders. On Friday, October 13<sup>th</sup>, Irico submitted its initial production of documents responsive to the Orders to Plaintiffs. These materials included the majority of: (1) the specific documents requested in the Orders that Baker Botts could collect directly from Irico personnel and (2) the responsive emails of relevant custodians identified through the use of the Plaintiffs’ and Baker Botts’ search terms applying the appropriate “Su qualifiers.”

Over the next week, by the requested October 23, 2023 extension, Baker Botts will finalize its review and production of the remaining responsive materials in the above two categories. Baker Botts also currently is reviewing the documents collected from the internal (text) messaging system of the fifteen selected custodians. These electronic files have been much more difficult to collect and review as Irico’s internal system is very different from traditional text messaging systems and has posed significant technical challenges. Regardless,

**BAKER BOTTS** LLP

The Honorable Vaughn R. Walker

- 2 -

Baker Botts believes it can complete its review and production of these materials in the next seven days, consistent with our requested extension, utilizing the Plaintiffs' and Baker Botts' search terms with appropriate "Su qualifiers." Baker Botts will also provide the additional materials called for in the Orders by October 23, 2023.

Irico's and Baker Botts' efforts in responding to Your Honor's Orders have been extremely diligent and as expeditious as possible, as detailed in our letter of October 9<sup>th</sup>. Any suggestion by Plaintiffs of intentional delay is uninformed and should be ignored. Plaintiffs are also incorrect that Irico did not object to its search terms: Irico objected to their unreasonable request to use unqualified terms that lacked any relevance to Mr. Su, as shown by the extraordinary hit rate, but Plaintiffs refused to engage in any substantive discussions.

We continue to believe Irico's proposed search terms (incorporating all of the root terms proposed by Plaintiffs, as well as Baker Botts' search terms, modified only by the "Su qualifiers") have captured the relevant documents that the Plaintiffs and Your Honor seek. We ask Your Honor to approve our proposed modifications to Plaintiffs' search terms. Otherwise, as discussed in our October 9<sup>th</sup> letter, Irico and Baker Botts would need at least another 30 days beyond the proposed October 23<sup>rd</sup> response date to complete the review for state secret content and responsiveness, likely with little if any, incremental information.

Please let us know if Your Honor needs any further information.

Sincerely,  
*/s/ John Taladay*  
John Taladay

cc: Tanveer Singh (tanveer.singh@fedarb.com)  
R. Alexander Saveri (rick@saveri.com)  
Geoffrey C. Rushing (geoff@saveri.com)  
Matthew D. Heaphy (mheaphy@saveri.com)  
Mario N. Alioto (malioto@tatp.com)  
Lauren C. Capurro (lauren russell@tatp.com)  
Daniel E. Birkhaeuser (dbirkhaeuser@bramsonplutzik.com)

# DOCUMENT 21

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October 23, 2023

VIA E-MAIL [VRW@JUDGEWALKER.COM]

The Honorable Vaughn R. Walker  
Law Office of Vaughn R. Walker  
Four Embarcadero Center, Suite 2200  
San Francisco, CA 94111

John Taladay  
TEL: 2026397909  
FAX: 2026391165  
john.taladay@bakerbotts.com

**Re: In re Cathode Ray Tube (CRT) Antitrust Litigation, MDL No. 1917, Master  
File No. 07-CV-944-JST/Plaintiffs' Motion for Sanctions**

Dear Judge Walker:

Defendants Irico Group Corp. and Irico Display Devices Co., Ltd. (collectively, "Irico") write pursuant to Your Honor's Interim Order and Second Interim Order on Plaintiffs' Motion for Sanctions (ECF Nos. 6264 and 6324) (the "Su Orders").

Irico has made today a final production of documents responsive to the Su Orders to Plaintiffs, including logs for all withheld or redacted documents. Enclosed with this letter is a declaration by the undersigned pursuant to the Second Interim Order regarding the steps taken under my direction and control to comply with the Su Orders as well as to detail other tasks completed as required by the Su Orders. Under separate cover to Your Honor and pursuant to the First Interim Order, Irico is providing a letter identifying "the names of Irico personnel involved in communicating with Su about: (a) his deposition, resignation and end of employment from January 1, 2021 to the present and (b) information about his participation and knowledge of competitor contacts and communications." ECF No. 6264 at 9.

Nothing in Irico's productions or any of the above-referenced materials is intended to constitute waiver of any rights or privileges. Irico has made every effort to identify and withhold privileged or otherwise protected material where appropriate. Any inadvertent disclosure of privileged material should not be construed as a waiver of privilege, as it is the companies' intention to maintain privilege as to all such matters.

If Your Honor has any questions, please do not hesitate to contact me.

Sincerely,

/s/ John Taladay  
John Taladay

*Counsel for Irico Group Corp. and  
Irico Display Devices Co., Ltd.*

**BAKER BOTTS** LLP

The Honorable Vaughn R. Walker

- 2 -

cc: Tanveer Singh (tanveer.singh@fedarb.com)  
R. Alexander Saveri (rick@saveri.com)  
Geoffrey C. Rushing (geoff@saveri.com)  
Matthew D. Heaphy (mheaphy@saveri.com)  
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Lauren C. Capurro (lauren russell@tatp.com)  
Daniel E. Birkhaeuser (dbirkhaeuser@bramsonplutzik.com)

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**WASHINGTON**

October 23, 2023

VIA E-MAIL [VRW@JUDGEWALKER.COM]  
**EX PARTE SUBMISSION**

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John Taladay  
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**Re: In re Cathode Ray Tube (CRT) Antitrust Litigation, MDL No. 1917, Master  
File No. 07-CV-944-JST/Plaintiffs' Motion for Sanctions**

Dear Judge Walker:

Defendants Irico Group Corp. and Irico Display Devices Co., Ltd. (collectively, "Irico") write pursuant to Your Honor's Interim Order and Second Interim Order on Plaintiffs' Motion for Sanctions (ECF Nos. 6264 and 6324) (the "Su Orders") to provide "the names of Irico personnel involved in communicating with Su [Xiaohua] about" certain topics. ECF No. 6264 at 9. The information provided below is based on the interviews conducted, relevant documents reviewed, and other investigation by Irico in response to the Su Orders. Nothing in Irico's submission of this information is intended to constitute waiver of any rights or privileges, as it is the companies' intention to maintain privilege as to all matters.

Irico identifies the following individuals as likely being involved in communicating with Mr. Su regarding:

**Mr. Su's Deposition**

1. Zhang Wenkai

**Mr. Su's Resignation and End of Employment**

1. Hao Li
2. Liu Zhao
3. Si Yuncong
4. Wang Jijun
5. Xu Jinmei
6. Zhang Bing
7. Zhang Dongling
8. Zhang Jiming
9. Zhang Wenkai

**Mr. Su's Participation and Knowledge of Competitor Contacts and Communications**

1. Zhang Wenkai



**BAKER BOTTS**<sub>LLP</sub>

The Honorable Vaughn R. Walker

- 2 -

Sincerely,

/s/ John Taladay

John Taladay

*Attorney for Defendants Irico Group Corp.  
and Irico Display Devices Co., Ltd.*

# **DOCUMENT 23**

1 John M. Taladay (*pro hac vice*)  
2 Evan J. Werbel (*pro hac vice*)  
3 Thomas E. Carter (*pro hac vice*)  
4 Andrew L. Lucarelli (*pro hac vice*)  
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13 drew.lucarelli@bakerbotts.com

8 *Attorneys for Defendants Irico Group Corp. and*  
9 *Irico Display Devices Co., Ltd.*

10  
11  
12  
13 **UNITED STATES DISTRICT COURT**  
14 **NORTHERN DISTRICT OF CALIFORNIA**  
15 **OAKLAND DIVISION**

16 IN RE: CATHODE RAY TUBE (CRT)  
17 ANTITRUST LITIGATION

Master File No. 07-CV-5944-JST

MDL No. 1917

18 This Document Relates to:

19 *ALL INDIRECT PURCHASER ACTIONS*  
20 *ALL DIRECT PURCHASER ACTIONS*

**DECLARATION OF JOHN M. TALADAY  
REGARDING COMPLIANCE WITH  
INTERIM ORDERS ON PLAINTIFFS'  
MOTION FOR DISCOVERY SANCTIONS**

21 Judge: Honorable Jon S. Tigar  
22  
23  
24  
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27  
28

1 I, John M. Taladay, declare as follows:

2 1. I am a member of the bar of the District of Columbia and admitted to practice before  
3 this Court *pro hac vice*. I am an attorney with Baker Botts L.L.P., which represents Defendants  
4 Irico Group Corporation (“Irico Group”) and Irico Display Devices Co., Ltd. (“Irico Display,”  
5 collectively, “Irico” or the “Irico Defendants”) in this action. I make this Declaration in support of  
6 Irico Defendants’ Submission in Response to the Orders Adopting the Special Master’s First and  
7 Second Interim Reports and Recommendations on Plaintiffs’ Motion for Discovery Sanctions. *See*  
8 ECF Nos. 6264 (“First Interim Order”); 6324 (“Second Interim Order,” collectively the “Orders”).  
9 If called as a witness, I could and would testify to the matters set forth in this declaration of my  
10 own personal knowledge.

11 2. As directed by the Special Master in the Second Interim Order, I submit this  
12 declaration to describe the steps taken under my direction and control to comply with the Special  
13 Master’s Orders requiring discovery into certain matters regarding Su Xiaohua as well as to detail  
14 other tasks completed as required by the Orders.

15 **Su Laptop, Other Devices and Documents**

16 3. At my direction, Thomas Carter, a Baker Botts attorney of record for Irico, traveled  
17 to China on September 10, 2023, along with Eric Chuang, a bilingual U.S.-based forensic  
18 collection specialist from BDO, a U.S. discovery vendor experienced in discovery of electronically  
19 stored information. *See Forensic Technology Services*, BDO USA, P.C. (last accessed Oct. 23,  
20 2023), <https://www.bdo.com/services/advisory/forensics-investigations/forensics-technology>.

21 4. Mr. Carter took physical custody of Mr. Su’s former laptop on September 12, 2023,  
22 and personally oversaw BDO’s imaging of the complete content of the laptop’s solid-state drive.  
23 BDO utilized Forensic Falcon Neo, a digital forensic imaging hardware device manufactured by  
24 Logicube, a well-known product in the forensic industry, to duplicate the solid-state drive, which is  
25 the same imaging equipment and software as is typically used for BDO’s U.S. forensic collections  
26 in litigation matters.

27 5. Mr. Carter then oversaw BDO’s forensic analysis of all recovered files from Mr.  
28 Su’s former laptop. BDO utilized Encase Forensic Software manufactured by Guidance Software,

1 a well-known product in the forensic industry, for the data recovery procedure, which is typically  
2 used for BDO's U.S. forensic collections in litigation matters.

3 6. Until leaving his position at Irico, Mr. Su most recently served as the General  
4 Manager of Irico (Foshan) Flat Panel Display Co., Ltd. ("Irico Foshan") located in the city of  
5 Foshan, China, where Mr. Su's former office was located. Based on information provided by Irico,  
6 we understand that Mr. Su's laptop was issued to him by Irico Foshan around the time he was first  
7 employed by that company beginning on December 31, 2019. BDO's analysis showed that the  
8 solid-state drive of Mr. Su's laptop had been reformatted on June 15, 2022 and a new copy of  
9 Microsoft Windows was installed at that time.<sup>1</sup> Based on Baker Botts' investigation this was done  
10 in connection with the repurposing of Mr. Su's laptop for use by his successor as General Manager,  
11 Zhang Jiming, who took possession of Mr. Su's former laptop when he assumed Mr. Su's former  
12 position. Based on interviews with Irico employees, we understand that Zhang Dongling, the  
13 Operations and Management Director for Irico Foshan, was responsible for repurposing the laptop  
14 for use by Zhang Jiming.

15 7. A report detailing the results of BDO's forensic analysis is attached as Exhibit 1.  
16 BDO recovered a total of 28,555 files with metadata dates within the time period in which Mr. Su  
17 potentially had use of the laptop, the vast majority of which were system files. Following de-  
18 duplication and removal of non-user created system files, approximately 9,000 files remained, prior  
19 to application of search terms. These files were transferred by BDO to a China-based Relativity  
20 server so that BDO could process and apply search terms to the data and to enable a state secret  
21 review before any materials were released to Baker Botts as described below.

22 8. I also instructed BDO to collect data from corporate servers containing Mr. Su's  
23 emails and internal text messages.

24 9. Also under my direction, Baker Botts and BDO investigated whether Mr. Su had  
25 any other company-issued or company-controlled devices other than his former laptop and  
26 determined that he did not.

27  
28 <sup>1</sup> We note that, at that time, the laptop and its contents were not subject to any discovery order.

10. Baker Botts and BDO also investigated whether there were any remaining hard copy files in or from Mr. Su's office and determined no such files existed. Mr. Su's successor, Zhang Jiming, had moved into Mr. Su's office more than a year ago, and he informed Mr. Carter that the office was empty when he moved in. Other Irico Foshan employees also confirmed that Mr. Su had removed any files from his office prior to his departure.

#### **Efforts to Contact Mr. Su**

11. [REDACTED]  
[REDACTED]  
[REDACTED]. See Ex. 2 (IRI-SU-000219E). In August, after the issuance of the First Interim Order but prior to the Second Interim Order, Zhang Wenkai, Irico's Assistant General Counsel, contacted Mr. Su by phone on a few occasions to seek his cooperation with responding the Orders. Mr. Su spoke briefly to Mr. Zhang, but on the final occasion, [REDACTED], Mr. Su insisted that that he not be contacted any further regarding this litigation. Mr. Zhang recorded this call, and we have attached a transcript of that discussion. See Ex. 3 (IRI-SU-000202E).

12. Despite Mr. Su's explicit request, pursuant to the Second Interim Order, Baker Botts attempted to contact Mr. Su on October 3, 2023, by sending a message through Mr. Zhang to Mr. Su via WeChat, a commonly used communication app in China, requesting to speak with Mr. Su regarding the issues raised in the Orders. Mr. Su did not respond to that request. See Ex. 4 (IRI-SU-000229E). Thus, we were not able to secure any cooperation by Mr. Su in connection with the current discovery initiative under the First and Second Interim Orders.

#### **Interviews of Other Irico Employees**

13. Under my direction and based on their positions or other information suggesting a potential connection to Mr. Su, Mr. Carter, together with bilingual BDO staff, interviewed 23 current or former employees of Irico Group and its subsidiaries. These individuals included: (1) human resources staff and department heads at Irico Group, Xianyang Irico Group Industrial Co., Ltd. ("Irico Industrial," the Irico subsidiary that directly managed Mr. Su's management appointments), and Irico Foshan; (2) top management at Irico Group, Irico Industrial, and Irico Foshan, including the four individuals whose names are set forth in the April 7, 2022, meeting

1 minute approving Mr. Su's resignation request; (3) former subordinates of Mr. Su at Irigo Foshan;  
2 (4) personnel at Irigo Group and Irigo Industrial responsible for ministerial drafting and approving  
3 official personnel paperwork; (5) members of the Irigo Group legal department; and (6)  
4 information technology personnel at Irigo Group.

5 14. These interviews covered topics relevant to the Orders, including interviewees'  
6 knowledge of Mr. Su's deposition, Mr. Su's departure from Irigo, Mr. Su's current employment,  
7 any ongoing relationship between Irigo and Mr. Su, communications with Mr. Su, information  
8 regarding other individuals who may have relevant knowledge, and potential locations of  
9 responsive documents. Mr. Carter reported to me regarding relevant information learned in these  
10 interviews.

#### 11 **Collection of Materials from Interviewees and Relevant Departments**

12 15. In each interview described above, on my instruction, Mr. Carter also inquired and  
13 attempted to determine whether the employee had any documents or personal communications  
14 responsive to the Orders that were not preserved on the corporate servers. As detailed below, Mr.  
15 Carter and BDO determined that emails and internal text messages would be preserved on  
16 corporate servers. If any interviewee indicated that they had responsive company documents not  
17 preserved on these corporate servers, all of those materials were collected by BDO. In some cases,  
18 the interviewees indicated that they had WeChat communications that might be responsive to the  
19 Orders on individual employee-owned phones (over which the company has no control) rather than  
20 on company devices or servers. Though none of interviewees would agree to provide their  
21 personal phones for forensic imaging and not all employees still had copies of their potentially  
22 relevant WeChat messages, those interviewees who stated that they still had relevant WeChat  
23 messages provided screen shots of those messages to BDO. All materials provided by these  
24 witnesses were given to BDO, and BDO loaded the documents to the China-based Relativity  
25 server.

26 16. Other specific materials required by the Orders were also collected directly (on a  
27 "go get" basis) from relevant departments such as human resources (e.g., Mr. Su's employment  
28

1 contract) and accounting (i.e., payment records). BDO loaded these materials onto the China-  
2 based Relativity server.

### 3 **Collection of Emails and Internal Text Messages from Corporate Servers**

4 17. After consultation with Mr. Carter regarding his interviews, I identified 15  
5 custodians (14 interviewees and Mr. Su) who appeared reasonably likely to have responsive  
6 electronic communications.<sup>2</sup> I then instructed BDO to collect all emails and internal text messages  
7 in the relevant time frame from the corporate servers for those custodians for further review. *See*  
8 Ex. 5 (Oct. 9, 2023, Letter Request to Special Master), Attachment A.

9 18. BDO worked with relevant information technology personnel responsible for  
10 maintaining the company servers to execute on this instruction. Email data and internal text  
11 message data were stored on different servers, so this effort required separate collections by BDO.

12 19. Regarding the emails, only 14 of the 15 custodians had mailboxes on the corporate  
13 server. Xu Jinmei, the Administration and HR Director at Irigo Foshan, did not have a company  
14 email address. In addition, the email box of Wang Jijun, while it existed on the server, was empty.  
15 The email box of Mr. Su was maintained on the server and data was collected.

16 20. Date filters were applied prior to collection based on the role of each custodian:  
17 January 1, 2021, through September 1, 2023 (or the last day of their employment with any Irigo  
18 company), for any custodian with potential knowledge or involvement regarding Mr. Su's  
19 requested deposition; and January 1, 2022, through September 1, 2023 (or the last day of their  
20 employment with any Irigo company), for all other custodians, i.e., those custodians who were  
21 identified only because of potential knowledge or involvement relating to Mr. Su's departure. The  
22 data from the 13 available email boxes were transferred from the server to an external hard drive by  
23 BDO.

24 21. Regarding the internal text messages, data was identified for all 15 custodians,  
25 including Mr. Su. The same date filters described above regarding the email collection also were  
26

27  
28 <sup>2</sup> The other nine individuals interviewed had incidental information or de minimis roles regarding  
Mr. Su's departure or application to travel for deposition.



1 applied to the internal text message data. The internal text message data was transferred from the  
2 server to an external hard drive by BDO.

3 22. BDO loaded the data from the external hard drives onto the China-based Relativity  
4 server. The available data for the 15 custodians gathered by BDO totaled 16,409 email files  
5 (including attachments) and 56,325 internal text message files (including attachments), a total of  
6 72,734 files.

### 7 **Application of Search Terms**

8 23. BDO, at my direction, applied search terms to the server data to attempt to narrow  
9 the materials to those most likely to be responsive to the Orders. BDO utilized standard search  
10 methodologies regularly utilized in the forensic searching in the US, pursuant to instructions from  
11 Baker Botts. To determine the search terms to apply, Baker Botts utilized the search terms that it  
12 identified, combined with the generic and unqualified search terms provided by Plaintiffs on  
13 September 7, 2023. As noted in our letter request submitted to the Special Master on October 9,  
14 2023, Plaintiffs' search terms omitted any requirement that the search terms be related in any way  
15 to Mr. Su: i.e., they failed to include any "Su qualifier" such as a variation of his name, employee  
16 ID number, citizen ID number or email address. For example, Plaintiffs' unqualified search terms  
17 hit on all documents sent or received by all custodians over a 20 to 32-month period that mention  
18 the word "leadership" irrespective of whether the document had any mention of, or relevance to,  
19 Mr. Su. As a result, the initial application of all of Plaintiffs' search terms resulted in hits on over  
20 40,000 documents – 55% of every message or document sent or received by every custodian during  
21 this 20 to 32-month period – a clear sign that the unqualified search terms were grossly overbroad  
22 in the context of a specific search that is wholly and solely directed at the circumstances of Mr.  
23 Su's departure and deposition. Moreover, reviewing all documents hitting on the unqualified  
24 search terms could not conceivably be accomplished in the required time frame for production,  
25 even with the extension sought by Irico in its letter request of October 9, 2023.

26 24. I then instructed BDO to again apply Baker Botts' and Plaintiffs' combined search  
27 terms, but this time applying the "Su qualifiers" to target those documents with some potential  
28 relevance to Mr. Su. *See* Ex. 5 (Oct. 9, 2023, Letter Request to Special Master) at 4-6,

1 Attachments C-F. However, for the data collected from Mr. Su's laptop, BDO applied all of  
2 Plaintiffs' search terms and Baker Botts' search terms without the application of any "Su  
3 qualifiers." In total, this effort resulted in approximately 9,400 files, which BDO then processed  
4 for further review.<sup>3</sup>

5 25. Irico and the Plaintiffs have disagreed on the use of "Su qualifiers" to narrow the  
6 collection of relevant materials, and in its letter request of October 9, 2023, Baker Botts asked the  
7 Special Master to approve the use of the "Su qualifiers" as a modification to Plaintiffs' search  
8 terms. Consistent with and in compliance with the Second Interim Order, BDO, at my direction,  
9 has collected and preserved the additional disputed documents that hit on Plaintiffs' search terms  
10 without "Su qualifiers," and they remain on the China-based Relativity server awaiting the Special  
11 Master's decision.

#### 12 **State Secret Review**

13 26. I understand from Irico as well as independent Chinese legal counsel by whom I  
14 was advised, that Irico and its employees are bound by Chinese legal requirements preventing the  
15 disclosure of Chinese state secrets.<sup>4</sup>

16 27. To ensure that all Chinese regulations regarding state secrets were followed here,  
17 BDO retained the AnJie Broad Law Firm ("AnJie"), a large and reputable Chinese law firm with  
18 whom Baker Botts has worked in the past, to conduct a review of the materials before releasing  
19 materials to the United States to be reviewed for responsiveness to the Orders. *See About AnJie*  
20 *Broad*, AnJie Broad (last accessed Oct. 23, 2023), <https://www.anjielaw.com/more/aboutus.html>.  
21 Counsel from AnJie informed me that Article 9 of the Chinese Law on Guarding State Secrets  
22 precludes the transmission of materials that contain state secrets, including but not limited to  
23 information that that could cause damage to the national security and interests of politics, economy,  
24 national defense or foreign affairs, to other countries or regions without the express permission of  
25 the relevant competent authorities. *See Law on Guarding State Secrets* (promulgated by the

26 <sup>3</sup> Of these approximately 9,400 files, only 22 originated from Mr. Su's former laptop, a likely result  
27 of the reformatting.

28 <sup>4</sup> I have been informed by Irico that documents previously collected and considered in response to  
discovery on the merits did not contain state secrets and that no such materials were withheld on  
state secret grounds.

1 Standing Comm. Nat'l People's Cong., Sept. 5, 1988, rev'd Apr. 29, 2010, effective Oct. 1, 2010),  
2 art. 9, 2010 P.R.C. Laws 71.75 (China).

3 28. To respect these requirements while facilitating Irico's compliance with the Orders,  
4 counsel from AnJie reviewed the following sets of documents (i.e., all that had been identified by  
5 Baker Botts as potentially relevant):

- 6 • all of the individual "go get" documents collected by BDO directly from  
7 interviewees or Irico departments;
- 8 • all of the documents from Mr. Su's laptop that hit on Plaintiffs' search terms and  
9 Baker Botts' search terms without applying any "Su qualifiers"; and
- 10 • all of the emails and internal text messages collected for the 15 custodians that hit  
11 on all of the search terms with "Su qualifiers."

12 This state secret review occurred before the documents were released to Baker Botts to be reviewed  
13 for responsiveness to the Orders. Thus, to be clear, AnJie did not withhold any documents on the  
14 basis that the documents were not responsive to the Orders. Their review was limited to evaluating  
15 the documents for state secret content, except as described in the following paragraph. AnJie did  
16 not identify any documents from Mr. Su's former laptop or from the direct "go get" materials from  
17 interviewees or Irico departments as containing state secrets. AnJie determined that 177 email files  
18 and 818 internal text message files, 995 files in total, could not be provided to Baker Botts for  
19 further review because of state secret content. Given AnJie's determination, these documents  
20 could not be released to the US or reviewed by US-based lawyers.

21 29. However, to further evaluate whether, and how many of, these documents were  
22 responsive to the Orders, I instructed Mr. Carter to train a lawyer from the AnJie firm who is a  
23 U.S.-barred and licensed attorney regarding the scope of the requirements of the Orders, and to  
24 provide him a copy of the Orders for his review and understanding. Mr. Carter reviewed the  
25 Orders with Cui Wei from AnJie, a member of the New York state bar, and Mr. Cui then reviewed  
26 the set of documents determined to contain state secrets for responsiveness. Based on Mr. Cui's  
27 review, it was determined that 21 of the 995 files withheld were responsive to the Orders. A log of  
28

1 the 21 responsive documents withheld under AnJie's determination of state secret content has been  
2 provided to Plaintiffs as part of the production.

3 30. I also understand from Irico as well as independent Chinese legal counsel by whom  
4 I was advised, that Irico is prohibited from disclosing personally identifiable information relating to  
5 individual employees. Such information is protected from disclosure by the China Personal  
6 Information Protection Law (promulgated by the Standing Comm. Nat'l People's Cong., Aug.  
7 20,2021, effective Nov. 1, 2021), art. 11, 2021 P.R.C. Laws 1117.1125 (China). In light of this  
8 requirement, AnJie and BDO also reviewed the following sets of documents to ensure that they did  
9 not contain any personally identifiable information:

- 10 • all of the individual "go get" documents collected by BDO directly from
- 11 interviewees or Irico departments;
- 12 • all of the documents from Mr. Su's laptop that hit on Plaintiffs' search terms and the
- 13 Baker Botts search terms without applying any "Su qualifiers"; and
- 14 • the emails and internal text messages collected for the 15 custodians that hit on all
- 15 of the search terms with "Su qualifiers."

16 No documents responsive to the Orders were withheld on the basis of such personal information.  
17 If such personal information was identified, per my instructions, AnJie or BDO applied solid black  
18 redactions only as to that personal information, which is clearly identified in the documents  
19 produced to the plaintiffs.

20 31. At my direction, BDO transferred all of the documents that it reviewed that did not  
21 contain state secrets, including those documents that contained redactions for personal information,  
22 from the China-based Relativity server to a US-managed Relativity service. Also at my direction,  
23 Mr. Carter trained a team of U.S.-barred attorneys fluent in Mandarin (since the subject documents  
24 were in Chinese) on the requirements of the Orders, and supervised their review of these  
25 documents for responsiveness. An initial production of responsive, non-privileged materials was  
26 made to Plaintiffs on October 13, 2023. This initial production included over 80% of responsive  
27 email files (excluding those that required privilege redactions) as well as over 80% of responsive  
28 files obtained through "go get" collections from interviewees or Irico departments. All remaining

responsive, non-privileged materials from the files transferred to the US-based server are being produced to the Plaintiffs today, October 23, 2023. Documents withheld for privilege have been identified on a privilege log provided to Plaintiffs.

**Submission of Letter to the Special Master under First Interim Order**

32. Along with this submission, Baker Botts is producing a letter to the Special Master, as required by the First Interim Order, providing “the names of Irico personnel involved in communicating with Mr. Su about: (a) his deposition, resignation and end of employment from January 2021 to the present and (b) information about his participation and knowledge of competitor contacts and communications.”

I declare under penalty of perjury that the foregoing is true and correct. Executed this 23<sup>rd</sup> day of October, 2023, in Washington, D.C.

/s/ John M. Taladay

John M. Taladay (*pro hac vice*)  
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700 K Street, N.W.  
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202.639.7700  
202.639.7890 (fax)  
Email: John.Taladay@bakerbotts.com

*Attorney for Defendants Irico Group Corp.  
and Irico Display Devices Co., Ltd.*

# EXHIBIT 1

## File Export Report by BDO – Su Xiaohua Laptop

We analyzed the image file using the Encase software and found that the Operating System of the computer was installed on June 15 2022 06:55:14 GMT. More details please see below screenshot picture.

Table		Timeline			
		Selected 0/9			
	Name	File Offset	Last Written	Type	Value Text
<input type="checkbox"/> 1	System Root		08/28/23 01:01:38 PM (+8:00 中国标准...	1	C:\WINDOWS
<input type="checkbox"/> 2	Shutdown Time		08/28/23 12:47:33 PM (+8:00 中国标准...	3	Mon, 28 Aug 2023 04:47:33 GMT
<input type="checkbox"/> 3	Registered Owner		08/28/23 01:01:38 PM (+8:00 中国标准...	1	zdl@ch.com.cn
<input type="checkbox"/> 4	Product Name		08/28/23 01:01:38 PM (+8:00 中国标准...	1	Windows 10 Home China
<input type="checkbox"/> 5	Product ID		08/28/23 01:01:38 PM (+8:00 中国标准...	1	00342-36245-38667-AAOEM
<input type="checkbox"/> 6	Path Name		08/28/23 01:01:38 PM (+8:00 中国标准...	1	C:\WINDOWS
<input type="checkbox"/> 7	Install Date		08/28/23 01:01:38 PM (+8:00 中国标准...	4	Wed, 15 Jun 2022 06:55:14 GMT
<input type="checkbox"/> 8	Current Version		08/28/23 01:01:38 PM (+8:00 中国标准...	1	6.3

File export statistics (Date range is on or before 2022/06/20)

Type	Number of exported files	Size of exported files
Edocs	427	88.9 MB
Emails	11	187.9 KB
Picture Files	24245	360.3 MB
Compressed Files	9	7.3 MB
Deleted Edocs	9	1.3 MB
Deleted Emails	1	131 KB
Deleted Picture Files	3836	83.7 MB
Deleted Compressed Files	17	2.6 MB

# EXHIBIT 2





October 20, 2023

**Certification**

**Welocalize Translations**

**TRANSLATOR'S DECLARATION:**

I, Ann Chen, hereby declare:

That I possess advanced knowledge of the Spanish and English languages. The attached Spanish into English translation has been translated by me and to the best of my knowledge and belief, it is a true and accurate translation of bates number: IRI-SU-000219.

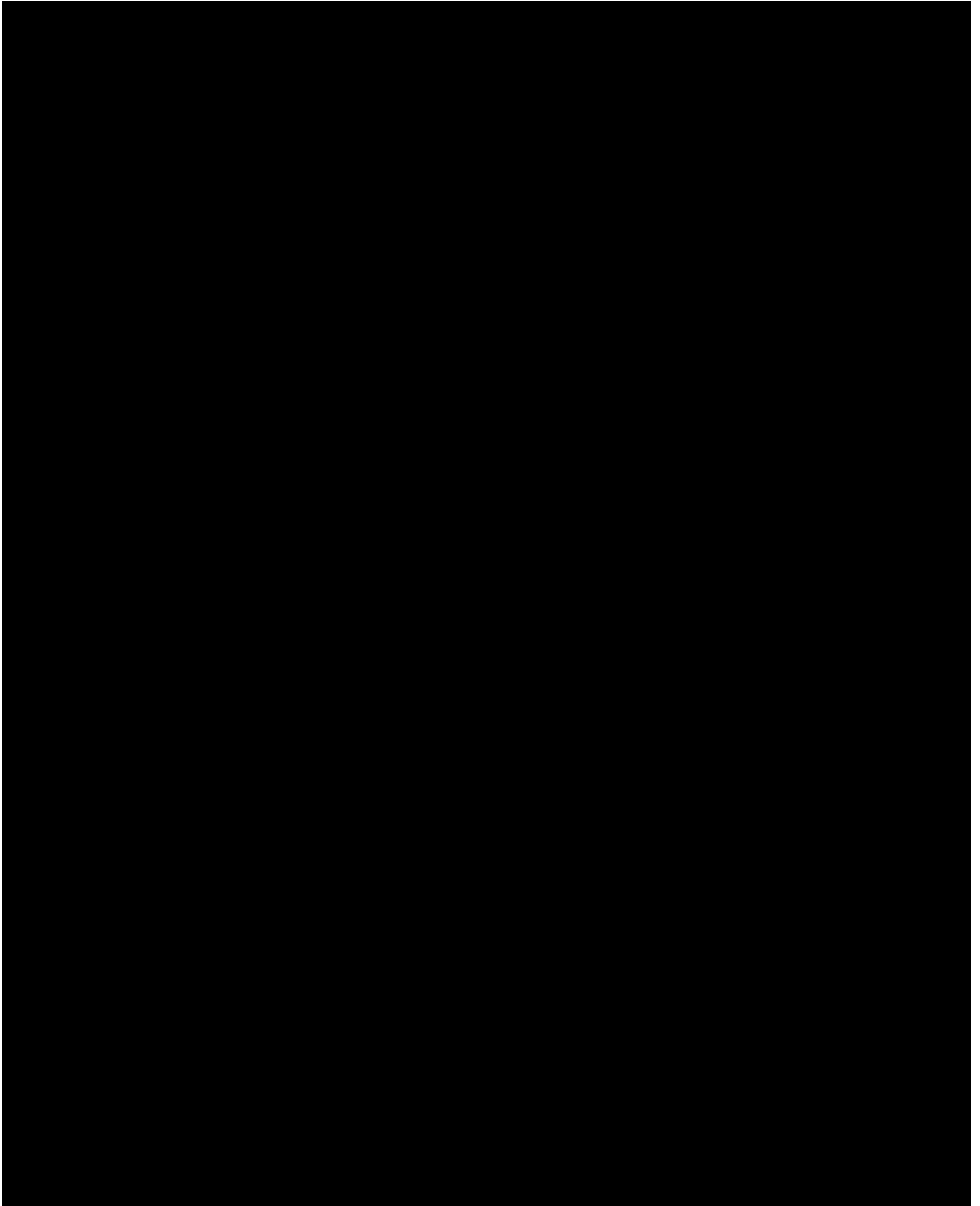
Ann Chen

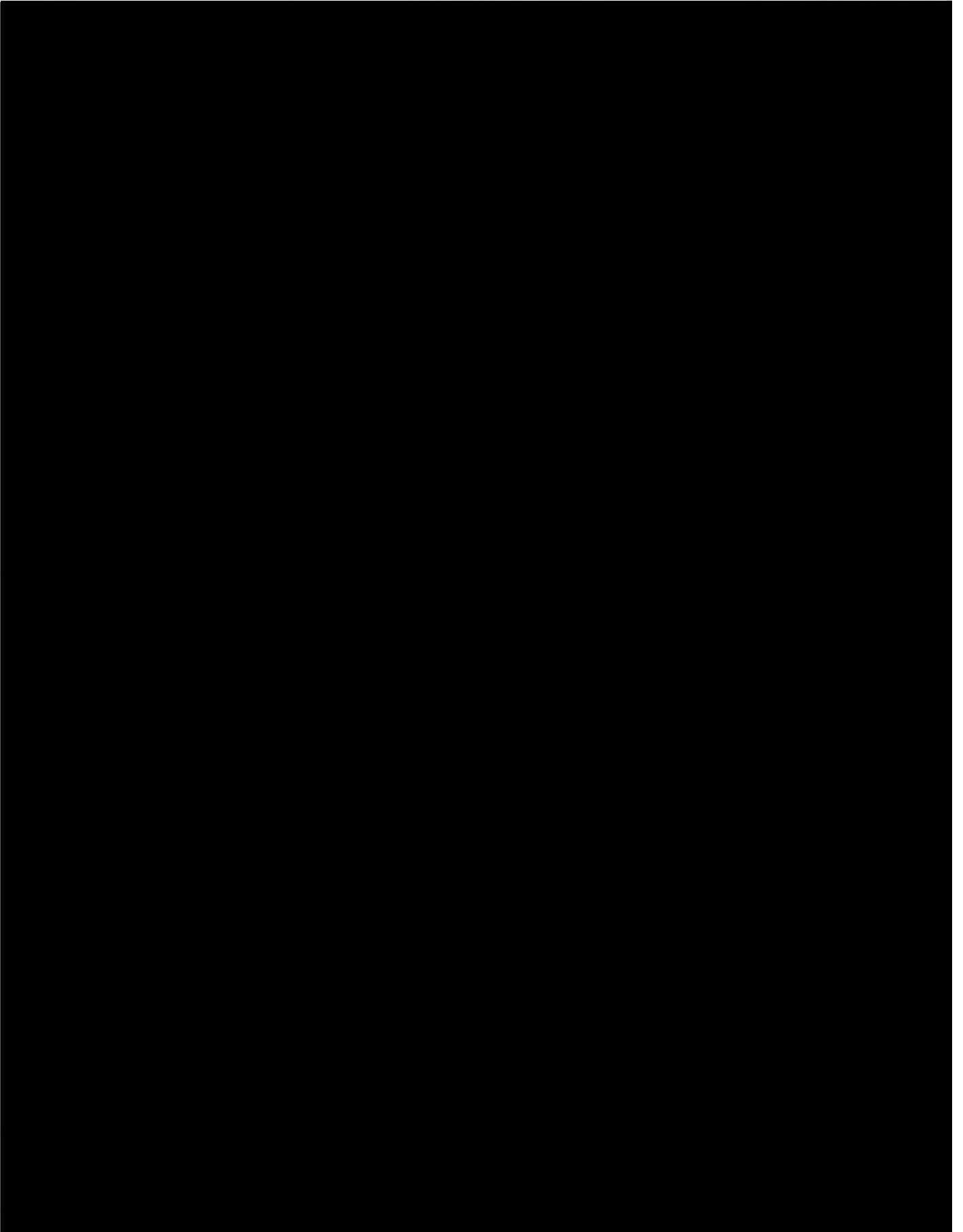
---

Ann Chen

Project Number: BBLP\_2310\_P0042

15 W. 37th Street 4th Floor  
New York, NY 10018  
212.581.8870





# EXHIBIT 3



October 20, 2023

**Certification**

**Welocalize Translations**

**TRANSLATOR'S DECLARATION:**

I, Ann Chen, hereby declare:

That I possess advanced knowledge of the Spanish and English languages. The attached Spanish into English translation has been translated by me and to the best of my knowledge and belief, it is a true and accurate translation of bates number: IRI-SU-000202.

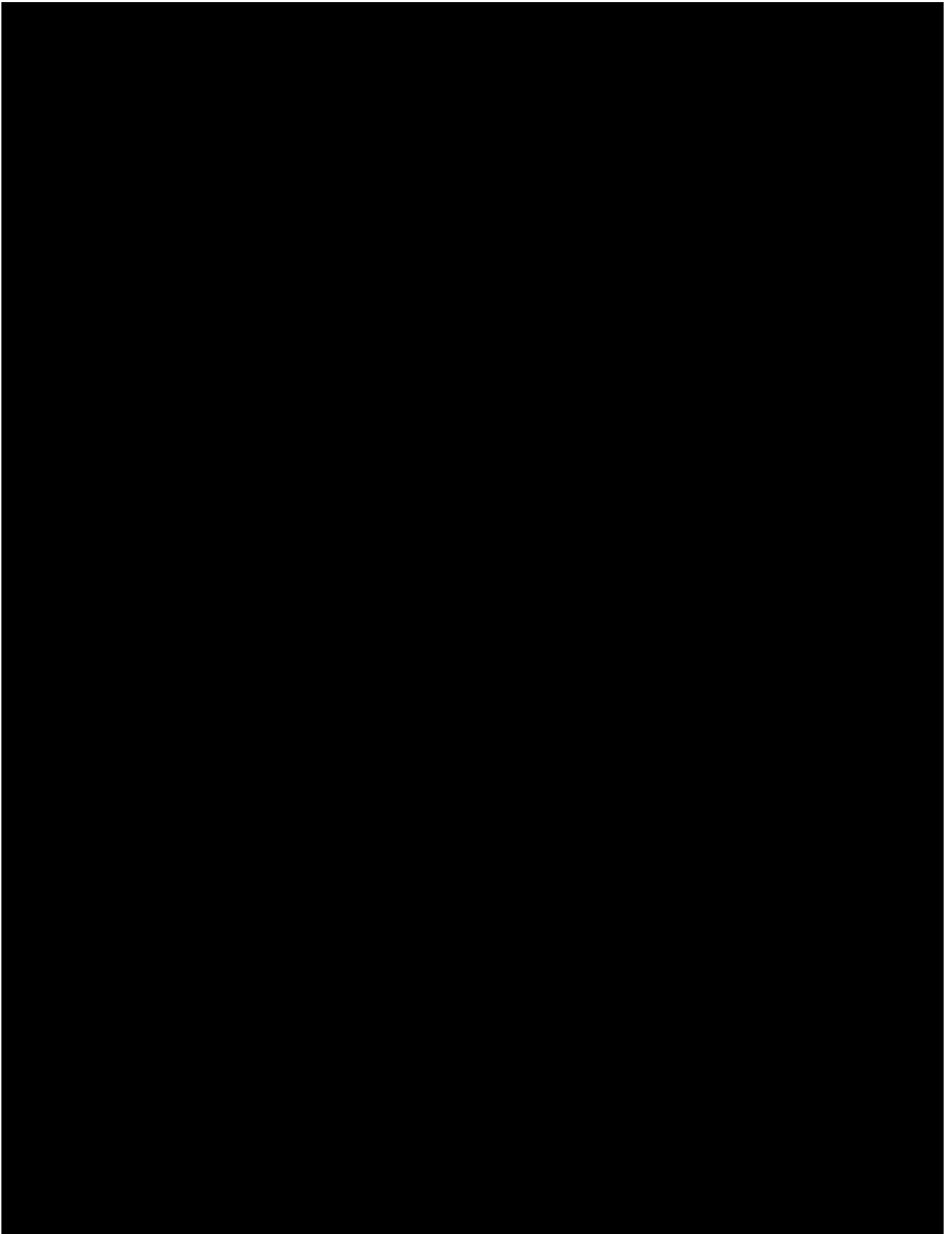
Ann Chen

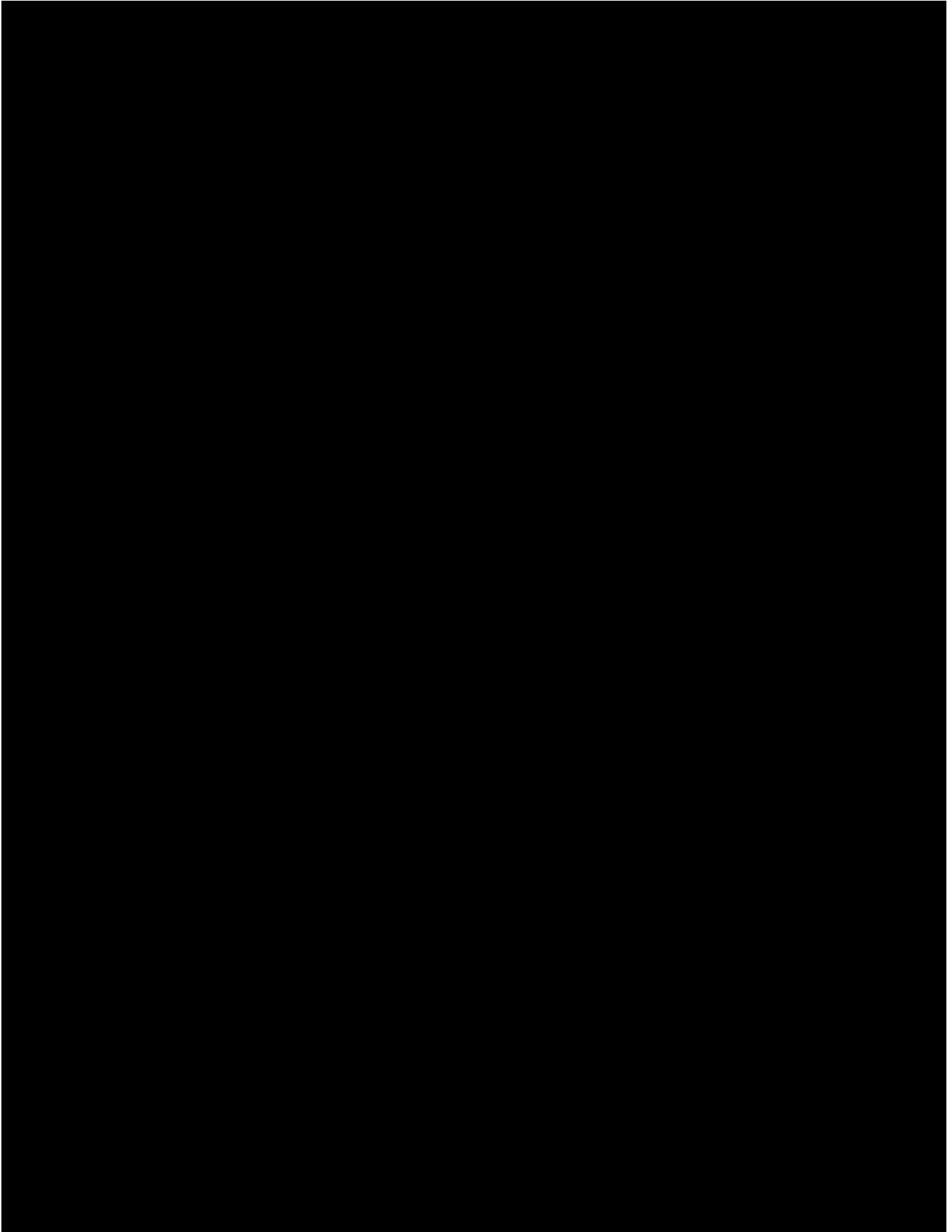
---

Ann Chen

Project Number: BBLP\_2310\_P0042

15 W. 37th Street 4th Floor  
New York, NY 10018  
212.581.8870











# EXHIBIT 4



October 20, 2023

**Certification**

**Welocalize Translations**

**TRANSLATOR'S DECLARATION:**

I, Ann Chen, hereby declare:

That I possess advanced knowledge of the Spanish and English languages. The attached Spanish into English translation has been translated by me and to the best of my knowledge and belief, it is a true and accurate translation of bates number: IRI-SU-000229.

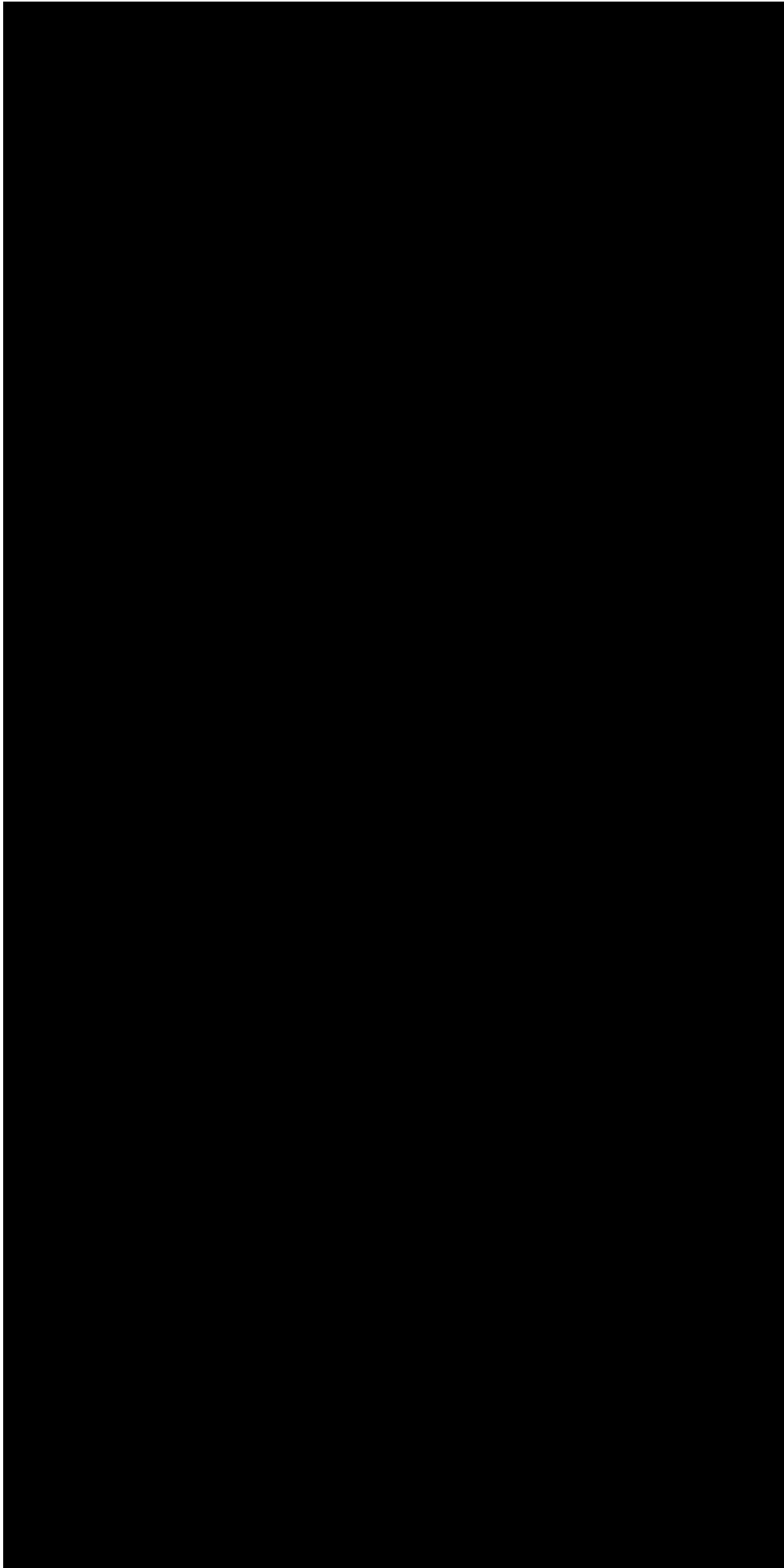
Ann Chen

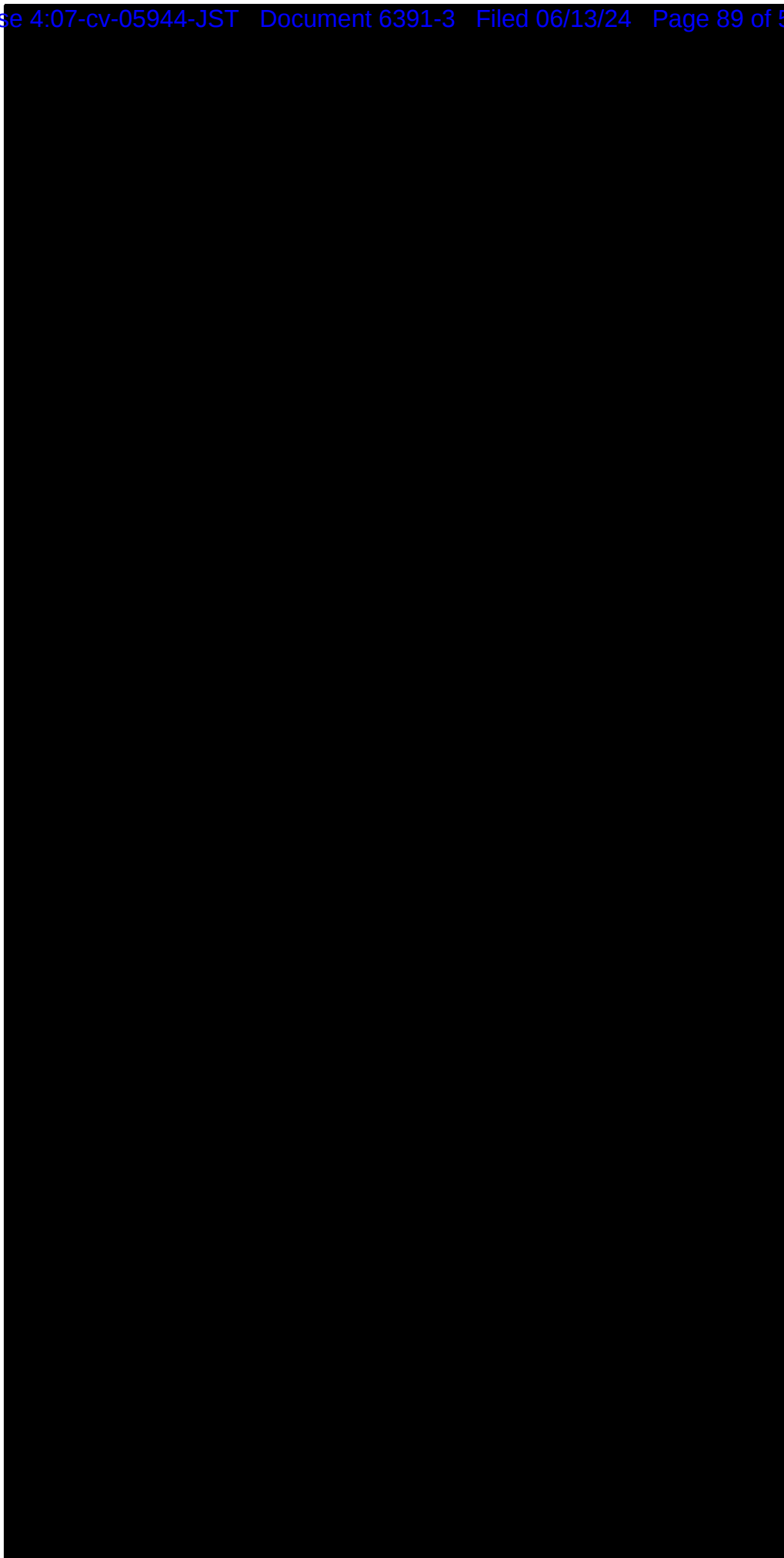
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Ann Chen

Project Number: BBLP\_2310\_P0042

15 W. 37th Street 4th Floor  
New York, NY 10018  
212.581.8870





# EXHIBIT 5

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**WASHINGTON**

October 9, 2023

VIA E-MAIL [VRW@JUDGEWALKER.COM]

John Taladay  
TEL: 2026397909  
FAX: 2026391165  
john.taladay@bakerbotts.com

The Honorable Vaughn R. Walker  
Law Office of Vaughn R. Walker  
Four Embarcadero Center, Suite 2200  
San Francisco, CA 94111

Re: In re Cathode Ray Tube (CRT) Antitrust Litigation, MDL No. 1917, Master File  
No. 07-CV-944-JST

Dear Judge Walker:

Defendants Irico Group Corp. and Irico Display Devices Co., Ltd. (collectively, “Irico”) write with respect to Your Honor’s Interim Reports and Recommendations on Plaintiffs’ Motion for Discovery Sanctions dated August 4, 2023 (ECF No. 6233) (“First Interim Order”), and September 1, 2023 (ECF No. 6275) (“Second Interim Order”) (collectively, “Orders”). This letter discusses three topics: (1) we provide an update regarding Irico’s compliance with the Orders; (2) we ask that Your Honor approve a modified version of Plaintiffs’ search terms to identify responsive documents, which Plaintiffs oppose; and (3) we request a short further extension to October 23, 2023, for the completion of Irico’s response to the Orders, which Irico will begin providing to Plaintiffs by the current deadline of October 13th.<sup>1</sup>

### **1. Update on Compliance Efforts to Date**

Irico and Baker Botts have undertaken extraordinary efforts to comply with Your Honor’s Orders and continue to work as expeditiously as possible on all fronts. As the Court is aware, Irico had already been working to comply with the Your Honor’s First Interim Order throughout the month of August through the efforts of Norton Rose Fulbright and with oversight by Baker Botts. After Your Honor’s Second Interim Order, Baker Botts needed to restart certain aspects of the investigation and processes to comply with new requirements that specified which entities were

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<sup>1</sup> As discussed in greater detail below, should Your Honor determine that Irico must review all of the Chinese-language documents that hit on Plaintiffs’ overbroad search terms, Irico would need at least an additional 40 days from the current deadline to review and produce any responsive documents from that set. Irico would still plan to produce responsive materials from its proposed search terms by October 23.

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required to undertake specific requirements of Your Honor's Orders. As required, I have personally directed and supervised the efforts and processes described below.

Since the Second Interim Order, Irico and Baker Botts have completed the following tasks in accordance with U.S. discovery standards:<sup>2</sup>

- A Baker Botts attorney of record traveled to China along with a bilingual U.S.-based forensic collection specialist from BDO, a U.S. discovery vendor, to personally implement the investigative steps described below under my direction;
- The same Baker Botts attorney took physical custody of Mr. Su's former laptop and personally oversaw BDO's imaging of the laptop's complete content and forensic analysis of all recovered files;
- Baker Botts, through an interpreter, conducted interviews of 23 current or former employees of Irico Group and its subsidiaries regarding relevant issues, including their knowledge of Mr. Su's deposition, Mr. Su's departure from Irico, Mr. Su's current employment, any ongoing relationship between Irico and Mr. Su, communications with Mr. Su, information regarding other individuals who may have relevant knowledge, and potential locations of responsive documents;
- Baker Botts identified 15 custodians potentially in possession of relevant documents and undertook forensic collection of email and internal text messaging. *See Attachment A* for a list of the selected custodians;
- BDO, under the direction of Baker Botts, collected all emails and internal text messages from the messaging system (including attachments) for all 15 custodians directly from the back-end server used by Irico, for all relevant time periods without any additional limitation.<sup>3</sup> This resulted in over 72,000 documents being collected from the relevant custodians;
- Baker Botts, with assistance from BDO, collected certain other responsive materials based on the interviews described above, including HR files, official

---

<sup>2</sup> The list below is intended to provide Your Honor a high-level overview of the steps taken to comply with the Orders. Further details on the processes implemented will be provided in a declaration when the process is complete as required by the Orders.

<sup>3</sup> The relevant time periods used for collection were January 1, 2021, through September 1, 2023 (or the last day of employment with any Irico company), for any custodians with any knowledge or involvement regarding Mr. Su's requested deposition, and January 1, 2022, through September 1, 2023 (or the last day of employment with any Irico company), for all other custodians.



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personnel announcements, and personal WeChat communications from personal devices to the extent the individual permitted such collection;

- Baker Botts utilized the complete list of search terms offered by Plaintiffs on September 7<sup>th</sup> and also developed additional search terms based on information learned from the interviews and the targeted document collections described above to identify potentially responsive documents. BDO then applied Plaintiffs' proposed search terms to all collected emails, internal enterprise messaging and shared files, and files recovered from Mr. Su's laptop, resulting in over 40,000 documents with direct hits, making up over 55 percent of all files collected from custodians.<sup>4</sup> As discussed below in Part 2 of this letter, Baker Botts then applied a set of "Su qualifiers" to the Plaintiffs' proposed search terms and added additional relevant search terms based on our investigation, resulting in a subset of 3,300 documents with direct hits for further review and processing;<sup>5</sup>
- These potentially responsive materials were then screened for state secrets as required by Chinese law. The state secret review was conducted by the AnJie law firm, one of China's largest and most highly regarded law firms, working with BDO under Baker Botts' direction, not under the direction of Irico. A small number of documents were withheld for state secret purposes and were handled as discussed below. All documents not deemed to contain states secrets were exported to a U.S.-based server for review by and under the supervision of Baker Botts attorneys;
- The three-week extension previously approved by the Special Master included one week from September 29 through October 6 that comprised the Chinese Golden Week holiday, a major annual holiday in China. In seeking the previous three-week extension, Baker Botts had planned that all of the steps described above would have been completed and the materials would all be loaded to the U.S.-based server for review before the start of the Chinese Golden Week holiday. Because of both logistical and technical challenges, and despite the efforts of Irico and its vendors during the holiday period, we were not able to accomplish all of those steps prior to the Golden Week holiday. However, as of yesterday, this process is now complete for the search terms described above, i.e., those documents that hit on a search term subject to the "Su qualifiers" described below. Baker Botts is now in

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<sup>4</sup> To account for family members and potentially related internal messages and attachments, approximately 55,000 files in total were identified as either direct search hits on Plaintiffs' proposed terms or potentially related to those direct hits.

<sup>5</sup> Accounting for family members and potentially related internal messages and attachments, a total of approximately 9,400 files were identified and segregated for further review under the proposed terms with "Su qualifiers."

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the process of conducting and directing the review of these materials for responsiveness and privilege;

- During this process, Baker Botts met and conferred twice with Plaintiffs regarding their proposed search terms and the need for reasonable limitations given the extremely high hit rate, and to discuss Baker Botts' proposed terms that incorporate such reasonable limitations, but Plaintiffs were not willing to discuss any specific limitations to their search terms, including applying the "Su qualifiers" to their search terms; and
- Finally, because state secret review was required before the documents could be transferred to the U.S. for responsiveness review, we had not yet determined whether any of the documents withheld for state secret purposes were responsive to the requirements of the Order. To address this issue, a bilingual U.S.-barred lawyer from the AnJie law firm, who was trained by Baker Botts regarding the scope of the Orders and worked under Baker Botts' direction, is conducting a relevance review of the documents withheld for state secret content.

## **2. Dispute Regarding Search Terms**

One of the most impactful changes in the Second Interim Order was that the Plaintiffs could provide search terms to be applied against the collected electronically stored information. As Your Honor is already aware, Plaintiffs took full advantage of Your Honor's offer and provided a list of around 80 terms without any qualifiers or limitations. *See* Attachment B. Most strikingly, Plaintiffs suggested search terms to be applied to the documents of all custodians without any requirement that any of these search terms relate to Mr. Su. As discussed below, this results in a gross over-identification of potentially responsive materials and would require an excessive degree of time and effort to review without the prospect of any meaningful uptick in responsive documents. Plaintiffs have declined to modify any the search terms to allow for some relevance to Mr. Su. Herein, Irico is proposing to apply all of Plaintiffs' search terms modified only by certain "Su qualifiers."

As detailed above, Baker Botts identified 15 custodians with ESI potentially responsive to the Orders. These custodians ranged from the most senior leadership at the company, to those in Human Resources who touched briefly on limited issues related to Mr. Su. Most of these individuals had only limited interactions, if any, with Mr. Su. Nonetheless, because our collection was comprehensive as to their electronic files on the company's servers, over 72,000 documents were collected during this process.

Despite most of these custodians having little to do with Mr. Su, over 40,000 of the documents hit on one of Plaintiffs' search terms. *See* Attachment C for Plaintiff search term hits on email files and Attachment D for Plaintiff search term hits on internal text messages. This was inevitable given that Plaintiffs made no effort to limit search terms to identify documents

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specifically relevant to Mr. Su. For example, one of Plaintiffs search terms was “leadership.” Plaintiffs seek to require Irico to identify and review every single document that used the word “leadership” regardless of whether it had any relevance to Mr. Su or whether Mr. Su was even mentioned in the document.<sup>6</sup> Over 14,000 documents (approximately 20 percent of the collected documents) hit on this term alone when combining the hits in for emails and internal text messages. Similarly, Plaintiffs’ search terms include numerous terms related to personnel and human resource functions but again make no effort to identify those documents specifically related to Mr. Su. Given that three of the custodians actually work in the human resources area, it is no surprise that almost 4,000 documents hit on the term “Human Resources Department.” Again, applying Plaintiffs’ unmodified search terms would require that we review all such documents for relevance, irrespective of whether they conceivably have anything to do with Mr. Su.

Baker Botts had already intended to use many of the same general terms that Plaintiffs suggested, as well as additional relevant terms that it intended to apply with appropriate qualifiers, consistent with U.S. discovery practice, to identify when those terms were used in reference to or related to Mr. Su. These “Su qualifiers” simply require that any document hitting on Plaintiffs’ search terms also include a term relating to Mr. Su either by his name (in various forms identified by Plaintiffs), his employee ID number, his citizen ID number or his email address. Specifically, the “Su qualifiers” include:

- “苏晓华,” Mr. Su’s full name in Chinese;
- “苏总,” an abbreviation for “General Manager Su,” sometimes used to refer to Mr. Su by his former colleagues;
- Xiaohua, Mr. Su’s given name in English;
- Mr. Su’s 18-digit Chinese citizen ID number;
- 100751, Mr. Su’s Irico employee ID number;
- sxh@ch.com.cn, Mr. Su’s email address; and
- sxh, the prefix for Mr. Su’s email address.

For example, Irico still ran the term for “leadership” but also required that term to appear somewhere in the same document as one of the Su qualifiers. This appropriate focus on Mr. Su reduced the number of hits on the term “leadership” from approximately 14,000 to approximately 1,000, which captures all instances where Mr. Su was mentioned or referenced in the same document as the term “leadership.” Applying these Su qualifiers to all of the search terms suggested by Plaintiffs reduced the total number of hits to be reviewed from over 40,000 to approximately 3,300 (not including attachments), a number much more in line with what would be expected given the narrow scope of the issues at hand and the broad responsibilities of most of

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<sup>6</sup> Note that all of these documents are in Chinese, which increases the time and burden in reviewing materials and identifying responsive materials.

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the custodians.<sup>7</sup> See Attachment E for search term hits with “Su qualifiers” on email files and Attachment F for search term hits with “Su qualifiers” on internal text messages.<sup>8</sup>

Baker Botts presented these results to Plaintiffs in the hopes of limiting the searches to more reasonable terms, but Plaintiffs surprisingly refused to engage in any substantive discussion on specific search terms. Previously, when Irico raised concerns with Your Honor about the scope of the search terms, Plaintiffs assured Your Honor (and Irico) that: “To the extent Irico communicates any legitimate concerns about any of these terms, Plaintiffs will address them immediately ....” Plaintiffs’ Letter Response to Request for Extension, at 2 (Sept. 14, 2023). Instead, Plaintiffs took the view that Baker Botts was required to produce all responsive documents under Your Honor’s Orders and “Plaintiffs cannot modify this requirement.” See Attachment G. That suggestion is wrong on at least two fronts. First, it is diametrically opposed to the representation that Plaintiffs made to Your Honor that it could and would work with Baker Botts to address plainly legitimate issues with their search terms. Second, it undermines the Special Master’s reasonable instruction, consistent with U.S. discovery practice, that search terms be used here as a way of identifying potentially relevant documents (rather than effectively demanding that Irico review every single communication from 15 employees over a span of years for targeted information relating to Mr. Su, which would be both unreasonable and unworkable).

So now Irico must ask for the Special Master’s assistance in resolving this dispute. The Second Interim Order states: “If Irico’s counsel deems any search terms improper, they can bring that matter to the undersigned’s attention and withhold production of selected documents until the objection is resolved. But collection of responsive documents precedes objections.” ECF No. 6324 at 5. Irico and Baker Botts are following Your Honor’s guidance exactly. We have collected all of the relevant materials and provided search term hit results to the Plaintiffs and Your Honor, but we request reasonable modification to the Plaintiffs’ search terms. As detailed above, we believe that adding the “Su qualifiers” described above to the search terms is appropriate and in accordance with U.S. discovery best practice, whereas Plaintiffs’ unbounded search terms are not. Without awaiting the Special Master’s decision on this dispute, we are moving forward on the review and production of documents that hit on the search terms applying the “Su qualifiers” and will be producing responsive materials as soon as possible.

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<sup>7</sup> In our unsuccessful meet and confer conversations with Plaintiffs, they appeared to suggest that Baker Botts should focus on reviewing all or some set of the documents that that did not hit on any terms with “Su qualifiers” to confirm that none of the documents contain responsive information. Focusing our efforts on the documents *least* likely to contain responsive material, however, is backwards, and Plaintiffs know that this is impractical given the sheer volume of the documents that hit on their unqualified search terms as well as the restrictions in China on releasing documents until they have been reviewed for state secrets.

<sup>8</sup> Minor modifications have been made to these charts since they were provided to Plaintiffs to account for typographical errors and search corrections, neither of which impacted the search results in any meaningful way.

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### 3. Request for Extension of Ten Days

The identification, collection and processing of the responsive documents and the collection of relevant information has been a laborious process as detailed above. We note again that the process requiring Baker Botts (and my own) direct involvement had to be restarted after the September 1<sup>st</sup> Order. Irico, Baker Botts and its vendors have faced many technical, logistical, and geographic hurdles, but we can assure the Special Master that extraordinary efforts have been undertaken and we have made substantial progress in the five weeks since its issuance. However, because the potentially responsive materials from China were not able to be uploaded to the U.S. for completion of review until after the Chinese Golden Week holiday, which just concluded, we will not be able to fulfill all requirements of the Orders by the current deadline of October 13<sup>th</sup>.<sup>9</sup>

We intend to produce materials to Plaintiffs on a rolling basis beginning with an initial production of responsive materials by the current deadline of October 13<sup>th</sup>. We believe we will need an additional 10 days (until October 23<sup>rd</sup>) to complete the review and production of the responsive materials and complete the other requirements of the Order, provided the Special Master approves the use of the Su qualifiers as discussed above. Should Your Honor require the application of all of Plaintiffs' suggested search terms without the Su qualifiers, however, the volume of documents to be processed, reviewed for state secret content, and reviewed for responsiveness would increase by well over five-fold. In that case, we estimate that Baker Botts would require an extension of at least 40 additional days from the current deadline to comply.

Thank you for your consideration of these issues.

Sincerely,  
*/s/ John Taladay*  
John Taladay

cc: Tanveer Singh (tanveer.singh@fedarb.com)  
R. Alexander Saveri (rick@saveri.com)  
Geoffrey C. Rushing (geoff@saveri.com)

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<sup>9</sup> As part of our meet and confer process, we asked for Plaintiffs' position on a one-week extension of the current deadline. Since the time of these discussions, there was a further, short delay in the transmission of the materials from China at the end of the Chinese Golden Week holiday so we now believe a ten-day extension will be necessary. Plaintiffs took no affirmative position on our request, but instead stated that the request "is more appropriately directed to Judge Walker." See Attachment G.

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Matthew D. Heaphy (mheaphy@saveri.com)

Mario N. Alioto (malioto@tatp.com)

Lauren C. Capurro (lauren russell@tatp.com)

Daniel E. Birkhaeuser (dbirkhaeuser@bramsonplutzik.com)

# Attachment A

*Irigo Custodian List - Oct. 6, 2023*

<b>Custodian Name</b>	<b>Position</b>
Bao Yong	Secretary of Commission for Discipline Inspection of CCP Committee of Irigo Group
Bing Zhang	Executive Director of Xianyang Irigo Group Industrial Co., Ltd.
Gao Qian	General Business Supervisor and Confidential Officer of the Group Office of Irigo Group
Guo Quan	Director of Group Office of Irigo Group
Hao Li	Director of Company Office of Xianyang Irigo Group Industrial Co, Ltd.
Mai Ya	HR Employee of Irigo Group
Shi Feng	HR Director of Irigo Group
Si Yuncong	(former) Chairman of Irigo Group
Su Xiaohua	Focus of investigation
Wang Jijun	Chief Financial Officer, Irigo (Foshan) Flat Panel Display Co., Ltd. and positions in other companies.
Xu Jinmei	Admin & HR Director of Irigo (Foshan) Panel Display Co., Ltd.
Yang Yuanjiang	(former) General Manager of Irigo Group
Zhang Dongling	Operation and Management Director of Irigo (Foshan) Panel Display Co., Ltd.
Zhang Jiming	General Manager of Irigo (Foshan) Panel Display Co., Ltd. and positions in other entities
Zhang Wenkai	Deputy General Counsel of Irigo Group



# Attachment B

**Carter, Tom**

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**From:** Matthew Heaphy <mheaphy@saveri.com>  
**Sent:** Thursday, September 7, 2023 2:57 PM  
**To:** Taladay, John; Werbel, Evan; Carter, Tom; Lucarelli, Drew;  
kaylee.yang@nortonrosefulbright.com; Geraldine W. Young  
**Cc:** vrw@judgewalker.com; Tanveer Singh; Rick Saveri; Geoff Rushing; David Hwu; Mario Alioto; Lauren Capurro; Dan Birkhaeuser; Alan Plutzik  
**Subject:** In re Cathode Ray Tube (CRT) Antitrust Litigation – MDL No. 1917, Master File No. 07-CV-5944-JST  
**Attachments:** Plaintiffs Su Search Terms.xlsx

[EXTERNAL EMAIL]

Counsel:

On behalf of DPPs and IPPs, attached please find Plaintiffs' search terms provided pursuant to the Special Master's Second Interim Report & Recommendation on Plaintiffs' Motion for Discovery Sanctions, dated September 1, 2023 (ECF No. 6275) (the "Order").

Plaintiffs request that Baker Botts provide a list of all additional search terms it intends to use in its compliance with the Order.

Thank you.

Matthew Heaphy  
Saveri & Saveri, Inc.  
706 Sansome Street  
San Francisco, CA 94111  
mheaphy@saveri.com  
Telephone: (415) 217-6810  
Facsimile: (415) 217-6813

Search Term	Comment	Source
邀请函	Invitation Letter	IRI-SU-000045 CONFIDENTIAL
加州	California	IRI-SU-000045 CONFIDENTIAL
联邦法院	Federal Court	IRI-SU-000045 CONFIDENTIAL
王昭杰	Wang Zhaojie	IRI-SU-000045 CONFIDENTIAL
苏晓华	Su Xiaohua	IRI-SU-000045 CONFIDENTIAL
Xiaohua		IRI-SU-000133 CONFIDENTIAL
闫云龙	Yan Yunlong	IRI-SU-000045 CONFIDENTIAL
张文凯	Zhang Wenkai	IRI-SU-000045 CONFIDENTIAL
马丁	Ma Ding	IRI-SU-000045 CONFIDENTIAL
	Su Xiaohua's ID number	IRI-SU-000045 CONFIDENTIAL
"100751"	Su Xiaohua's Employee number	IRI-CRT-00031561
证人	Witness	IRI-SU-000045 CONFIDENTIAL
作证	Testify	IRI-SU-000045 CONFIDENTIAL
澳门	Macau	IRI-SU-000045 CONFIDENTIAL
<a href="mailto:sxh@ch.com.cn">sxh@ch.com.cn</a>	Su's work email	IRI-SU-000052 CONFIDENTIAL
zhangwenkai0713	Zhang's email ID	IRI-SU-000052 CONFIDENTIAL
[All emails, email handles, and IDs used in WeChat and other communication platforms of the individuals named in this list]		
承诺书	<b>Declaration</b> of personnel traveling abroad	IRI-SU-000052 CONFIDENTIAL
苏总	GM Su	IRI-SU-000052 CONFIDENTIAL
CRT		IRI-SU-000129 CONFIDENTIAL
反垄断	Antitrust	IRI-SU-000129 CONFIDENTIAL
诉讼	Litigation	IRI-SU-000129 CONFIDENTIAL
取证	deposition	IRI-SU-000129 CONFIDENTIAL
通行证	Travel permit	IRI-SU-000129 CONFIDENTIAL
签注	Visa	IRI-SU-000129 CONFIDENTIAL
赴港澳	to Hong Kong and Macau	IRI-SU-000103 CONFIDENTIAL
百尺竿头	[Zhang Wenkai's WeChat alias]	IRI-SU-000103 CONFIDENTIAL
尚婷婷	Shang Ting Ting	IRI-SU-000129 CONFIDENTIAL
香港	Hong Kong	IRI-SU-000129 CONFIDENTIAL
高倩	Gao Qian	IRI-SU-000130 CONFIDENTIAL
郭泉	Guo Quan	IRI-SU-000130 CONFIDENTIAL
焦润刚	Jiao Rungang	IRI-SU-000130 CONFIDENTIAL
白建刚	Bai Jiangang	IRI-SU-000130 CONFIDENTIAL
总经理	General Manager	IRI-SU-000130 CONFIDENTIAL
董事长	Chairman	IRI-SU-000130 CONFIDENTIAL
司总	Chairman Si	IRI-SU-000131 CONFIDENTIAL
美国法院	American Courts	IRI-SU-000131 CONFIDENTIAL
证据	Evidence	IRI-SU-000131 CONFIDENTIAL
法律事务	Legal Affairs	IRI-SU-000131 CONFIDENTIAL
领导	Leadership	IRI-SU-000132 CONFIDENTIAL
法务	Legal Affairs	IRI-SU-000132 CONFIDENTIAL
司云聪	Si Yuncong	IRI-SU-000137 CONFIDENTIAL
阳元江	Yang Yuanjiang	IRI-SU-000137 CONFIDENTIAL
包勇	Bao Yong	IRI-SU-000137 CONFIDENTIAL
石峰	Shi Feng	IRI-SU-000137 CONFIDENTIAL
人力资源部	Human Resources Department	IRI-SU-000137 CONFIDENTIAL
专题会	Special Topic Meeting	IRI-SU-000137 CONFIDENTIAL
离岗	Depart from Post	IRI-SU-000137 CONFIDENTIAL
提前	ahead of time	IRI-SU-000137 CONFIDENTIAL
实业	IRICO Group <b>Industrial</b> Ltd.	IRI-SU-000137 CONFIDENTIAL

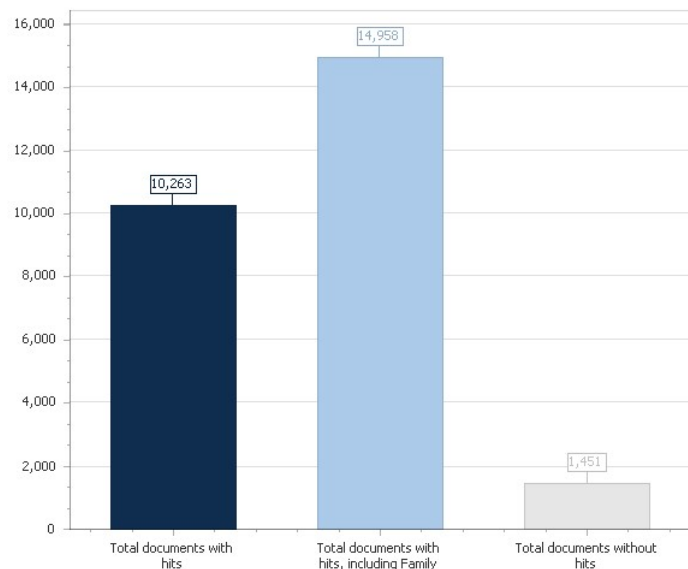
华南	Southern China	IRI-SU-000137 CONFIDENTIAL
绩效考评办法	Irico Group Ltd. <b>Method for Managing and Evaluating Performance</b> of Managers	IRI-SU-000137 CONFIDENTIAL
辞职	Quit	IRI-SU-000141 CONFIDENTIAL
申请	Application	IRI-SU-000141 CONFIDENTIAL
拖	Delay	
延	Postpone	
缓	Postpone	
慢	Slow (to slow)	
借口	Excuse	
藉口	Excuse	
彩管	CRT	
配合	Cooperate	
退休	Retire	
返聘	Rehire	
调岗	Transfer jobs	
顾问	Consultant	
劳务	Labor Contract	
离职	Depart from Post	
解除	Dissolve	
劳动关系	Relationship of Employment	
保险	Insurance	
年金	Pension	IRI-CRT-00007138
个人账户	Personal Account (Pension)	IRI-CRT-00007138
奖励	Reward	IRI-CRT-00007138
养老	Retirement	IRI-CRT-00007148
薪金	Salary	
补贴	Allowance	
绩效	Performance	
奖金	Bonus	

# Attachment C



## Irico Search Terms Report

**Report Name:** 100923 Plaintiffs' Terms Email Server Data for All Custodian  
**Searchable Set:** 0237 Keyword Search Scope of Email Server on All



### Results Summary

Documents in searchable set	Total documents with hits	Total documents with hits, including Family	Total documents without hits
16409	10263	14958	1451

### Terms Summary

Term	Documents with hits	Documents with hits, including Family	Unique hits	Translation/Note
"100751"	3	60	0	Su Xiaohua's employee number
"[REDACTED]"	17	45	0	Su Xiaohua's ID number
bai	36	244	1	Bai Jiangang's email ID
baoyong	241	261	184	Bao Yong's email ID
CRT	1,263	2,547	357	
gqian	678	2,040	380	Gao Qian's email ID
gquan	779	1,262	587	Guo Quan's email ID
jiaorg	3	9	0	Jiao Rungang's email ID
mad	125	479	1	Ma Ding's email ID
mail(sxh@ch.com.cn)	833	1,273	0	Su Xiaohua's work email
shangtt123	10	32	0	Shang Tingting's email ID
shf	152	326	57	Shi Feng's email ID
sxh	833	1,273	0	Su Xiaohua's email ID
wzj-xs	20	76	0	Wang Zhaojie's email ID
Xiaohua	190	756	1	
yanyunlong	1,120	2,771	1	Yan Yunlong's email ID
zhangwenkai0713	2,660	8,842	346	Zhang's email ID
专题会	52	396	0	Special Topic Meeting
个人账户	65	217	19	Personal Account (Pension)
人力资源部	295	1,702	14	Human Resources Department
作证	550	1,260	0	testify
保险	440	2,644	11	Insurance
借口	2	4	0	Excuse
养老	364	1,697	0	Retirement
加州	45	128	0	California
劳务	453	2,026	76	Labor Contract
劳动关系	455	1,117	0	Relationship of Employment

Term	Documents with hits	Documents with hits, including Family	Unique hits	Translation/Note
包勇	57	81	0	Bao Yong
华南	56	234	2	Southern China
反垄断	551	1,537	0	Antitrust
取证	105	390	3	deposition
司云聪	671	2,881	114	Si Yuncong
司总	737	3,416	50	Chairman Si
奖励	233	948	15	Reward
奖金	358	1,005	2	Bonus
实业	771	3,324	79	Industry
尚婷婷	12	37	0	Shang Ting Ting
年金	45	331	0	Pension
延	1,706	6,069	148	Postpone
张文凯	1,999	6,119	0	Zhang Wenkai
彩管	396	2,651	20	CRT
总经理	1,256	4,415	75	General Manager
慢	75	566	0	Slow (to slow)
承诺书	108	365	5	Declaration of personnel traveling abroad
拖	270	1,840	73	Delay
提前	466	3,126	20	ahead of time
法务	141	1,370	3	Legal Affairs
法律事务	894	3,143	3	Legal Affairs
澳门	227	755	0	Macau
焦润刚	12	35	0	Jiao Rungang
王昭杰	244	926	0	Wang Zhaojie
申请	1,470	5,668	237	Application
白建刚	31	204	0	Bai Jiangang
百尺竿头	3	9	0	Zhang Wenkai's WeChat alias
石峰	133	385	1	Shi Feng
离岗	73	268	1	Depart from Post
离职	680	1,895	5	Depart from Post
签证	19	86	0	Visa
绩效	440	913	19	Performance
绩效考评办法	41	49	0	Method for Managing and Evaluating Performance of Managers
缓	257	1,189	8	Postpone
美国法院	58	101	0	American Courts
联邦法院	9	16	0	federal court
苏总	209	510	0	GM Su
苏晓华	299	1,019	0	Su Xiaohua
董事长	817	3,687	13	Chairman
薪金	196	733	0	Salary
藉口	0	0	0	Excuse
补贴	489	1,795	33	Allowance
解除	497	1,643	3	Dissolve
证人	614	1,443	1	witness
证据	1,336	3,546	0	Evidence
诉讼	1,221	3,271	25	Litigation
调岗	5	7	0	Transfer jobs
赴港澳	14	78	0	to Hong Kong and Macau
辞职	138	583	1	Quit
返聘	20	310	0	Rehire
退休	642	2,776	24	Retire
通行证	77	255	0	Travel permit
邀请函	69	126	9	invitation letter
郭泉	99	262	0	Guo Quan

Term	Documents with hits	Documents with hits, including Family	Unique hits	Translation/Note
配合	664	3,456	13	Cooperate
闫云龙	994	2,576	0	Yan Yunlong
阳元江	78	126	1	Yang Yuanjiang
顾问	775	1,732	9	Consultant
领导	1,405	4,567	130	Leadership
香港	1,730	4,574	267	Hong Kong
马丁	160	574	0	Ma Ding
高倩	222	582	1	Gao Qian

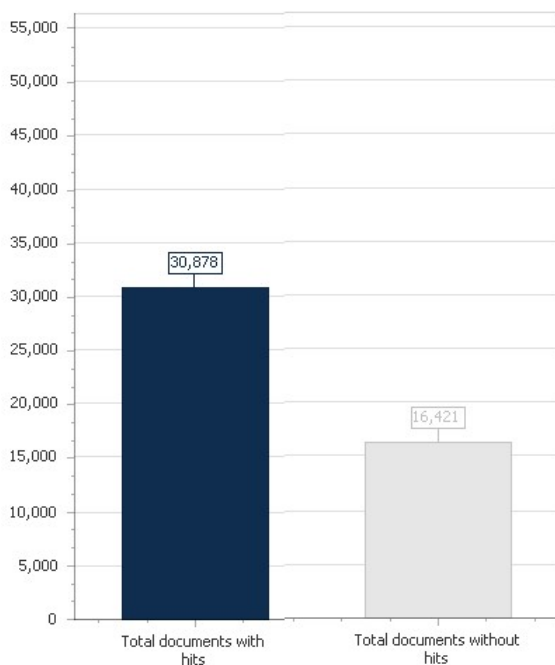


# Attachment D



## Irico Search Terms Report

Report Name: 100923 Plaintiffs' Terms Terms on BM  
Data



### Results Summary

Documents in searchable set	Total documents with hits	Total documents without hits
56325	30878	16421

### Terms Summary

Term	Documents with hits	Unique hits	Translation/Note
"100751"	232	0	Su Xiaohua's employee number
"[REDACTED]"	82	1	Su Xiaohua's ID number
bai	4	0	Bai Jiangang's email ID
baoyong	1	0	Bao Yong's email ID
CRT	571	36	
gqian	13	3	Gao Qian's email ID
gquan	4	1	Guo Quan's email ID
jiaorg	4	0	Jiao Rungang's email ID
mad	4	0	Ma Ding's email ID
mail(sxh@ch.com.cn)	7	0	Su Xiaohua's work email
shangtt123	8	0	Shang Tingting's email ID
shf	6	0	Shi Feng's email ID
sxh	8	0	Su Xiaohua's email ID
wzj-xs	1	0	Wang Zhaojie's email ID
Xiaohua	8	0	
yanyunlong	17	0	Yan Yunlong's email ID
zhangwenkai0713	21	0	Zhang's email ID
专题会	906	31	Special Topic Meeting
个人账户	30	0	Personal Account (Pension)

Term	Documents with hits	Unique hits	Translation/Note
人力资源部	3,631	257	Human Resources Department
作证	401	7	testify
保险	1,448	49	Insurance
借口	26	0	Excuse
养老	762	29	Retirement
加州	85	0	California
劳务	1,980	109	Labor Contract
劳动关系	672	6	Relationship of Employment
包勇	1,447	517	Bao Yong
华南	2,010	347	Southern China
反垄断	544	12	Antitrust
取证	237	16	deposition
司云聪	1,276	73	Si Yuncong
司总	2,543	81	Chairman Si
奖励	2,657	90	Reward
奖金	1,503	7	Bonus
实业	5,448	843	Industry
尚婷婷	345	76	Shang Ting Ting
年金	268	11	Pension
延	2,784	188	Postpone
张文凯	1,633	508	Zhang Wenkai
彩管	395	6	CRT
总经理	5,470	117	General Manager
慢	315	40	Slow (to slow)
承诺书	376	34	Declaration of personnel traveling abroad
拖	642	33	Delay
提前	2,021	252	ahead of time
法务	767	35	Legal Affairs
法律事务	1,108	7	Legal Affairs
澳门	296	5	Macau
焦润刚	988	166	Jiao Rungang
王昭杰	440	5	Wang Zhaojie
申请	3,803	562	Application
白建刚	873	109	Bai Jiangang
百尺竿头	7	0	Zhang Wenkai's WeChat alias
石峰	3,095	1,357	Shi Feng
离岗	1,307	8	Depart from Post
离职	993	48	Depart from Post
签证	112	1	Visa
绩效	3,866	109	Performance
绩效考评办法	522	0	Method for Managing and Evaluating Performance of Managers
缓	1,007	147	Postpone
美国法院	79	0	American Courts
联邦法院	44	0	federal court
苏总	544	98	GM Su
苏晓华	2,638	297	Su Xiaohua

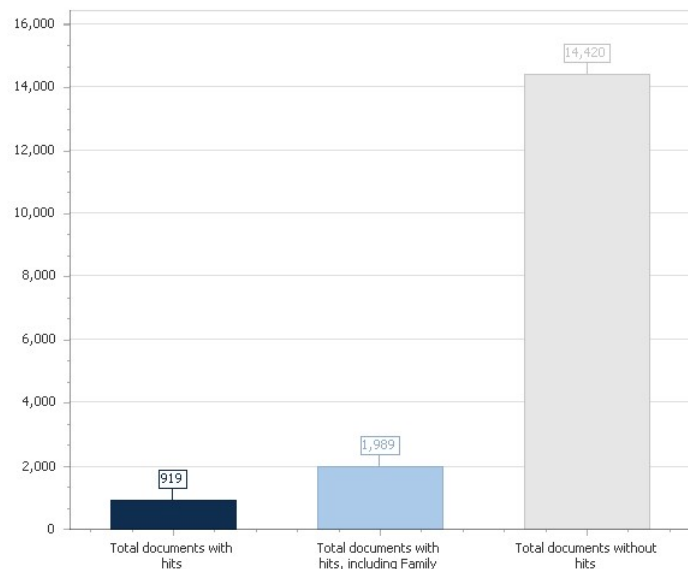
Term	Documents with hits	Unique hits	Translation/Note
董事长	2,281	21	Chairman
薪金	937	0	Salary
藉口	0	0	Excuse
补贴	2,143	56	Allowance
解除	1,964	36	Dissolve
证人	380	5	witness
证据	607	11	Evidence
诉讼	1,506	43	Litigation
调岗	78	0	Transfer jobs
赴港澳	43	0	to Hong Kong and Macau
辞职	555	0	Quit
返聘	746	0	Rehire
退休	2,894	72	Retire
通行证	227	5	Travel permit
邀请函	101	3	invitation letter
郭泉	1,474	517	Guo Quan
配合	2,521	132	Cooperate
闫云龙	854	43	Yan Yunlong
阳元江	1,025	188	Yang Yuanjiang
顾问	1,481	13	Consultant
领导	12,985	3,029	Leadership
香港	1,259	176	Hong Kong
马丁	248	17	Ma Ding
高倩	3,069	1,921	Gao Qian

# Attachment E



## Irico Search Terms Report

**Report Name:** 100923 Proposed Terms Terms Searches on Email Sever Data  
**Searchable Set:** 0237 Keyword Search Scope of Email Server on All



### Results Summary

Documents in searchable set	Total documents with hits	Total documents with hits, including Family	Total documents without hits
16409	919	1989	14420

### Terms Summary

Term	Documents with hits	Documents with hits, including Family	Unique hits	Translation/Note
"4月7日" AND (苏晓华 OR "Xiaohua" OR OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	19	79	0	[variations of potentially relevant dates]
"5月25日" AND (苏晓华 OR "Xiaohua" OR OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	33	59	0	[variations of potentially relevant dates]
"6月17日" AND (苏晓华 OR "Xiaohua" OR OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	27	130	0	[variations of potentially relevant dates]
"交接" AND (苏晓华 OR "Xiaohua" OR OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	12	68	0	handover
"任职年龄上限" AND (苏晓华 OR "Xiaohua" OR OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	1	3	0	upper age limit for appointment
"作证" AND (苏晓华 OR "Xiaohua" OR OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	169	377	4	testify
"免职" AND (苏晓华 OR "Xiaohua" OR OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	25	25	0	removal

Term	Documents with hits	Documents with hits, including Family	Unique hits	Translation/Note
"内退" AND (苏晓华 OR "Xiaohua" OR ██████████ OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	35	47	0	retreat
"尊坤" AND (苏晓华 OR "Xiaohua" OR ██████████ OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	2	5	0	Zunkun
"尊坤" AND (苏晓华 OR "Xiaohua" OR ██████████ OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	1	2	0	Zunshen
"报告" AND (苏晓华 OR "Xiaohua" OR ██████████ OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	137	740	0	report
"推荐" AND (苏晓华 OR "Xiaohua" OR ██████████ OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	29	106	1	recommend
"新单位" AND (苏晓华 OR "Xiaohua" OR ██████████ OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	0	0	0	new unit
"新职位" AND (苏晓华 OR "Xiaohua" OR ██████████ OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	0	0	0	new position
"最后工作日" AND (苏晓华 OR "Xiaohua" OR ██████████ OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	1	4	0	last day
"深圳" AND (苏晓华 OR "Xiaohua" OR ██████████ OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	103	349	2	Shenzhen
"离任" AND (苏晓华 OR "Xiaohua" OR ██████████ OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	27	66	0	leaving office
"离岗" AND (苏晓华 OR "Xiaohua" OR ██████████ OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	39	57	0	leaving post
"终止" AND (苏晓华 OR "Xiaohua" OR ██████████ OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	33	198	0	termination
"美国" AND (苏晓华 OR "Xiaohua" OR ██████████ OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	126	445	0	United States
"老母亲" AND (苏晓华 OR "Xiaohua" OR ██████████ OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	0	0	0	old mother

Term	Documents with hits	Documents with hits, including Family	Unique hits	Translation/Note
"证人" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	134	317	0	witness
"辞职" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	73	172	0	resign
"退休" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	80	407	0	retire
("4-7" OR "4.7") AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	37	204	5	[variations of potentially relevant dates]
("5-25" OR "5.25") AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	37	287	3	[variations of potentially relevant dates]
("6-17" OR "6.17") AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	23	129	4	[variations of potentially relevant dates]
bai AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	1	4	0	Bai Jiangang's email ID
baoyong AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	0	0	0	Bao Yong's email ID
CRT AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	202	678	40	
gqian AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	0	0	0	Gao Qian's email ID
gquan AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	0	0	0	Guo Quan's email ID
jiaorg AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	0	0	0	Jiao Rungang's email ID
mad AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	23	57	0	Ma Ding's email ID
shangtt123 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	0	0	0	Shang Tingting's email ID



Term	Documents with hits	Documents with hits, including Family	Unique hits	Translation/Note
shf AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	0	0	0	Shi Feng's email ID
wzj-xs AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	17	47	0	Wang Zhaojie's email ID
yanyunlong AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	233	708	2	Yan Yunlong's email ID
zhangwenkai0713 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	269	705	1	Zhang's email ID
专题会 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	3	9	0	Special Topic Meeting
个人账户 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	9	15	2	Personal Account (Pension)
人力资源部 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	84	409	0	Human Resources Department
保险 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	38	205	1	Insurance
借口 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	0	0	0	Excuse
养老 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	24	62	0	Retirement
加州 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	3	7	0	California
劳务 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	33	206	0	Labor Contract
劳动关系 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	39	162	0	Relationship of Employment
包勇 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	28	33	0	Bao Yong

Term	Documents with hits	Documents with hits, including Family	Unique hits	Translation/Note
华南 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	16	100	0	Southern China
反垄断 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	106	408	0	Antitrust
取证 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	14	67	0	deposition
司云聪 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	97	456	0	Si Yuncong
司总 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	84	349	0	Chairman Si
奖励 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	26	101	0	Reward
奖金 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	6	75	0	Bonus
实业 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	77	289	0	Industry
尚婷婷 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	5	15	0	Shang Ting Ting
年金 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	3	31	0	Pension
延 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	95	309	0	Postpone
张文凯 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	279	865	0	Zhang Wenkai
彩管 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	42	334	0	CRT
总经理 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	88	547	0	General Manager

Term	Documents with hits	Documents with hits, including Family	Unique hits	Translation/Note
慢 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	1	2	0	Slow (to slow)
承诺书 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	30	58	3	Declaration of personnel traveling abroad
拖 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	10	40	0	Delay
提前 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	71	123	0	ahead of time
法务 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	32	248	1	Legal Affairs
法律事务 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	201	601	0	Legal Affairs
澳门 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	89	258	0	Macau
焦润刚 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	5	15	0	Jiao Rungang
王昭杰 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	146	655	2	Wang Zhaojie
申请 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	105	350	3	Application
白建刚 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	11	52	0	Bai Jiangang
百尺竿头 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	0	0	0	[Zhang Wenkai's WeChat alias]
石峰 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	32	46	0	Shi Feng
离职 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	143	555	1	Depart from Post

Term	Documents with hits	Documents with hits, including Family	Unique hits	Translation/Note
签证 AND (苏晓华 OR "Xiaohua" OR OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	4	27	0	Visa
绩效 AND (苏晓华 OR "Xiaohua" OR OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	34	82	1	Performance
绩效考评办法 AND (苏晓华 OR "Xiaohua" OR OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	30	37	0	Method for Managing and Evaluating Performance of Managers
缓 AND (苏晓华 OR "Xiaohua" OR OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	33	173	0	Postpone
联邦法院 AND (苏晓华 OR "Xiaohua" OR OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	3	7	0	federal court
董事长 AND (苏晓华 OR "Xiaohua" OR OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	82	545	0	Chairman
薪金 AND (苏晓华 OR "Xiaohua" OR OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	0	0	0	Salary
藉口 AND (苏晓华 OR "Xiaohua" OR OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	0	0	0	Excuse
补贴 AND (苏晓华 OR "Xiaohua" OR OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	31	191	3	Allowance
解除 AND (苏晓华 OR "Xiaohua" OR OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	42	135	0	Dissolve
证据 AND (苏晓华 OR "Xiaohua" OR OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	275	802	0	Evidence
诉讼 AND (苏晓华 OR "Xiaohua" OR OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	151	607	0	Litigation
调岗 AND (苏晓华 OR "Xiaohua" OR OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	0	0	0	Transfer jobs
赴港澳 AND (苏晓华 OR "Xiaohua" OR OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	9	34	0	to Hong Kong and Macau

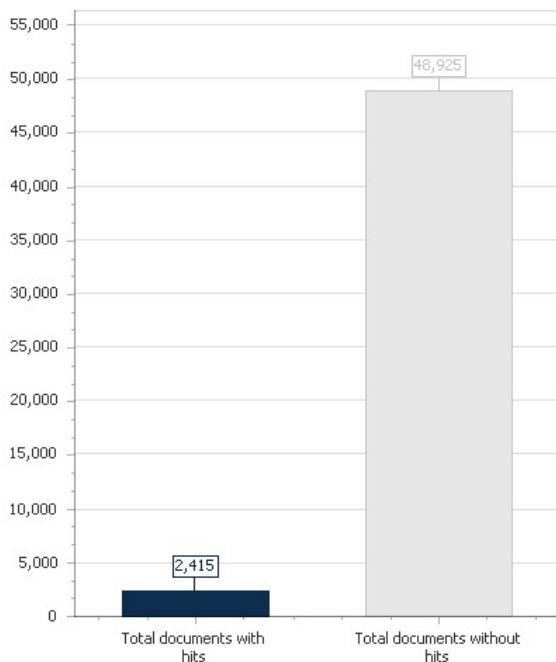
Term	Documents with hits	Documents with hits, including Family	Unique hits	Translation/Note
返聘 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	2	5	0	Rehire
通行证 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	32	75	0	Travel permit
邀请函 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	21	30	1	invitation letter
郭泉 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	5	15	0	Guo Quan
配合 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	107	219	0	Cooperate
闫云龙 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	231	842	7	Yan Yunlong
阳元江 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	29	38	0	Yang Yuanjiang
顾问 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	62	188	0	Consultant
领导 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	113	485	1	Leadership
香港 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	494	807	362	Hong Kong
马丁 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	43	100	0	Ma Ding
高倩 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	0	0	0	Gao Qian

# Attachment F



## Irico Search Terms Report

Report Name: 100923 Proposed Terms on BM Data



### Results Summary

Documents in searchable set	Total documents with hits	Total documents without hits
56325	2415	48925

### Terms Summary

Term	Documents with hits	Unique hits	Translation/Note
"4月7日" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	12	0	[variations of potentially relevant dates]
"5月25日" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	19	0	[variations of potentially relevant dates]
"6月17日" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	35	0	[variations of potentially relevant dates]
"交接" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	78	0	handover
"任职年龄上限" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	13	0	upper age limit for appointment

Term	Documents with hits	Unique hits	Translation/Note
"作证" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	50	0	testify
"免职" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	45	0	removal
"内退" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	699	0	retreat
"尊坤" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	0	0	Zunkun
"尊绅" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	0	0	Zunshen
"报告" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	275	13	report
"推荐" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	136	4	recommend
"新单位" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	33	0	new unit
"新职位" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	0	0	new position
"最后工作日" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	0	0	last day
"深圳" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	293	5	Shenzhen
"离任" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	106	0	leaving office



Term	Documents with hits	Unique hits	Translation/Note
"离岗" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	629	2	leaving post
"终止" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	385	0	termination
"美国" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	28	0	United States
"老母亲" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	2	0	old mother
"证人" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	26	0	witness
"辞职" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	60	0	resign
"退休" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	863	1	retire
("4-7" OR "4.7") AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	144	0	[variations of potentially relevant dates]
("5-25" OR "5.25") AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	8	0	[variations of potentially relevant dates]
("6-17" OR "6.17") AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	22	0	[variations of potentially relevant dates]
bai AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	1	0	Bai Jiangang's email ID
baoyong AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	1	0	Bao Yong's email ID

Term	Documents with hits	Unique hits	Translation/Note
CRT AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	22	6	
gqian AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	1	0	Gao Qian's email ID
gquan AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	1	0	Guo Quan's email ID
jiaorg AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	1	0	Jiao Rungang's email ID
mad AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	1	0	Ma Ding's email ID
shangtt123 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	1	0	Shang Tingting's email ID
shf AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	1	0	Shi Feng's email ID
wzj-xs AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	1	0	Wang Zhaojie's email ID
yanyunlong AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	1	0	Yan Yunlong's email ID
zhangwenkai0713 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	1	0	Zhang's email ID
专题会 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	87	6	Special Topic Meeting
个人账户 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	4	0	Personal Account (Pension)

Term	Documents with hits	Unique hits	Translation/Note
人力资源部 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	132	0	Human Resources Department
保险 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	408	6	Insurance
借口 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	3	0	Excuse
养老 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	382	7	Retirement
加州 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	4	0	California
劳务 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	906	48	Labor Contract
劳动关系 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	247	0	Relationship of Employment
包勇 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	34	0	Bao Yong
华南 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	550	36	Southern China
反垄断 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	37	4	Antitrust
取证 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	47	0	deposition
司云聪 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	49	0	Si Yuncong

Term	Documents with hits	Unique hits	Translation/Note
司总 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	119	2	Chairman Si
奖励 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	597	5	Reward
奖金 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	741	0	Bonus
实业 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	648	68	Industry
尚婷婷 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	12	0	Shang Ting Ting
年金 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	38	1	Pension
延 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	199	4	Postpone
张文凯 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	54	2	Zhang Wenkai
彩管 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	20	0	CRT
总经理 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	687	11	General Manager
慢 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	16	2	Slow (to slow)
承诺书 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	53	1	Declaration of personnel traveling abroad

Term	Documents with hits	Unique hits	Translation/Note
拖 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	77	0	Delay
提前 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	118	5	ahead of time
法务 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	106	6	Legal Affairs
法律事务 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	73	0	Legal Affairs
澳门 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	52	0	Macau
焦润刚 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	9	0	Jiao Rungang
王昭杰 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	53	0	Wang Zhaojie
申请 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	310	19	Application
白建刚 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	20	0	Bai Jiangang
百尺竿头 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	0	0	[Zhang Wenkai's WeChat alias]
石峰 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	49	2	Shi Feng
离职 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	84	0	Depart from Post

Term	Documents with hits	Unique hits	Translation/Note
签证 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	41	0	Visa
绩效 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	846	5	Performance
绩效考核办法 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	22	0	Method for Managing and Evaluating Performance of Managers
缓 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	116	0	Postpone
联邦法院 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	3	0	federal court
董事长 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	125	1	Chairman
薪金 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	602	0	Salary
藉口 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	0	0	Excuse
补贴 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	767	3	Allowance
解除 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	412	1	Dissolve
证据 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	98	0	Evidence
诉讼 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	187	0	Litigation

Term	Documents with hits	Unique hits	Translation/Note
调岗 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	22	0	Transfer jobs
赴港澳 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	7	0	to Hong Kong and Macau
返聘 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	407	0	Rehire
通行证 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	44	0	Travel permit
邀请函 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	8	0	invitation letter
郭泉 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	24	0	Guo Quan
配合 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	222	13	Cooperate
闫云龙 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	54	2	Yan Yunlong
阳元江 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	43	0	Yang Yuanjiang
顾问 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	482	0	Consultant
领导 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	964	48	Leadership
香港 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	191	1	Hong Kong

Term	Documents with hits	Unique hits	Translation/Note
马丁 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	18	0	Ma Ding
高倩 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	21	0	Gao Qian



# Attachment G

**Carter, Tom**

---

**From:** Lauren Russell <LaurenRussell@TATP.com>  
**Sent:** Friday, October 6, 2023 8:00 PM  
**To:** Werbel, Evan; Carter, Tom; Matthew Heaphy; Rick Saveri  
**Cc:** Geoff Rushing; David Hwu; Mario Alioto; Dan Birkhaeuser; Alan Plutzik; Taladay, John; Lucarelli, Drew; kaylee.yang@nortonrosefulbright.com; Geraldine W. Young  
**Subject:** RE: In re Cathode Ray Tube (CRT) Antitrust Litigation – MDL No. 1917, Master File No. 07-CV-5944-JST

[EXTERNAL EMAIL]

Evan:

We have discussed and considered your request that Plaintiffs agree to your proposed limitations of our search terms, but we cannot agree to your request. We are not able to test your proposed limiters or have any visibility into the results of the searches to know whether responsive documents are being missed.

Judge Walker's Order requires Baker Botts to search for and "produce to plaintiffs *all* non-privileged documents responsive to the Su Order and this order and a privilege log for any withheld documents." Interim Order at 9 (emphasis added). Plaintiffs cannot modify this requirement. Judge Walker gave Plaintiffs the opportunity to propose search terms, which we did, but ultimately it is Baker Botts' responsibility to ensure that whatever search methodologies are used, all responsive documents are captured.

As for your requested extension of time to comply with Judge Walker's Order, that request is more appropriately directed to Judge Walker. However, Plaintiffs note that you were aware of Plaintiffs' search terms as well as any Chinese government review requirements when you requested the three-week extension. In addition, given that you are only looking for documents relating to Mr. Su's resignation, many relevant documents should be identifiable without search terms. Any such documents should be produced by the current deadline, along with the other information ordered by Judge Walker that does not involve review of search results.

Regards,

Lauren

Lauren C. Capurro (Russell)  
Attorney at Law  
Trump, Alioto, Trump & Prescott, LLP  
Telephone: (415) 860-5051  
E-mail: [lauren russell@t ATP.com](mailto:lauren russell@t ATP.com)

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**From:** Werbel, Evan <evan.werbel@bakerbotts.com>  
**Sent:** Friday, October 6, 2023 3:37 PM  
**To:** Carter, Tom <Tom.Carter@BakerBotts.com>; Matthew Heaphy <mheaphy@saveri.com>; Rick Saveri <rick@saveri.com>; Lauren Russell <LaurenRussell@TATP.com>  
**Cc:** Geoff Rushing <geoff@saveri.com>; David Hwu <dhwu@saveri.com>; Mario Alioto <MAlioto@TATP.com>; Dan

Birkhaeuser <[dbirkhaeuser@bramsonplutzik.com](mailto:dbirkhaeuser@bramsonplutzik.com)>; Alan Plutzik <[aplutzik@bramsonplutzik.com](mailto:aplutzik@bramsonplutzik.com)>; Taladay, John <[john.taladay@bakerbotts.com](mailto:john.taladay@bakerbotts.com)>; Lucarelli, Drew <[drew.lucarelli@bakerbotts.com](mailto:drew.lucarelli@bakerbotts.com)>; kaylee.yang@nortonrosefulbright.com; Geraldine W. Young <[geraldine.young@nortonrosefulbright.com](mailto:geraldine.young@nortonrosefulbright.com)>  
**Subject:** RE: In re Cathode Ray Tube (CRT) Antitrust Litigation – MDL No. 1917, Master File No. 07-CV-5944-JST

Matt and all, As requested, attached is a list of the 15 custodians that we have been discussing along with information on their relevant positions and entities. We are also looking into the other questions that you raised during our meet and confer today. The preliminary response that we received on deduplication of emails and internal texts is that all the search results have been deduped, but we are confirming further and will get back to you on that issue and the others discussed.

We look forward to hearing from Plaintiffs on the key word searches and on the request for an extension.

Thanks,  
Evan

**Evan J. Werbel**  
**Baker Botts L.L.P.**  
[evan.werbel@bakerbotts.com](mailto:evan.werbel@bakerbotts.com)

T - 202.639.1323

M - 202.744.0819

700 K Street, NW  
Washington, DC 20001  
USA

---

**From:** Carter, Tom <[Tom.Carter@BakerBotts.com](mailto:Tom.Carter@BakerBotts.com)>

**Sent:** Thursday, October 5, 2023 4:43 PM

**To:** Matthew Heaphy <[mheaphy@saveri.com](mailto:mheaphy@saveri.com)>; Werbel, Evan <[evan.werbel@bakerbotts.com](mailto:evan.werbel@bakerbotts.com)>; Rick Saveri <[rick@saveri.com](mailto:rick@saveri.com)>; Lauren Capurro <[LaurenRussell@TATP.com](mailto:LaurenRussell@TATP.com)>

**Cc:** Geoff Rushing <[geoff@saveri.com](mailto:geoff@saveri.com)>; David Hwu <[dhwu@saveri.com](mailto:dhwu@saveri.com)>; Mario Alioto <[MAlioto@TATP.com](mailto:MAlioto@TATP.com)>; Dan Birkhaeuser <[dbirkhaeuser@bramsonplutzik.com](mailto:dbirkhaeuser@bramsonplutzik.com)>; Alan Plutzik <[aplutzik@bramsonplutzik.com](mailto:aplutzik@bramsonplutzik.com)>; Taladay, John <[john.taladay@bakerbotts.com](mailto:john.taladay@bakerbotts.com)>; Lucarelli, Drew <[drew.lucarelli@bakerbotts.com](mailto:drew.lucarelli@bakerbotts.com)>; kaylee.yang@nortonrosefulbright.com; Geraldine W. Young <[geraldine.young@nortonrosefulbright.com](mailto:geraldine.young@nortonrosefulbright.com)>

**Subject:** RE: In re Cathode Ray Tube (CRT) Antitrust Litigation – MDL No. 1917, Master File No. 07-CV-5944-JST

Matt, please see attached. The terms added by Irico (not including duplicative terms with Plaintiffs' list) are marked in blue at the bottom of the list.

---

**From:** Matthew Heaphy <[mheaphy@saveri.com](mailto:mheaphy@saveri.com)>

**Sent:** Thursday, October 5, 2023 3:30 PM

**To:** Carter, Tom <[Tom.Carter@BakerBotts.com](mailto:Tom.Carter@BakerBotts.com)>; Werbel, Evan <[evan.werbel@bakerbotts.com](mailto:evan.werbel@bakerbotts.com)>; Rick Saveri <[rick@saveri.com](mailto:rick@saveri.com)>; Lauren Capurro <[LaurenRussell@TATP.com](mailto:LaurenRussell@TATP.com)>

**Cc:** Geoff Rushing <[geoff@saveri.com](mailto:geoff@saveri.com)>; David Hwu <[dhwu@saveri.com](mailto:dhwu@saveri.com)>; Mario Alioto <[MAlioto@TATP.com](mailto:MAlioto@TATP.com)>; Dan Birkhaeuser <[dbirkhaeuser@bramsonplutzik.com](mailto:dbirkhaeuser@bramsonplutzik.com)>; Alan Plutzik <[aplutzik@bramsonplutzik.com](mailto:aplutzik@bramsonplutzik.com)>; Taladay, John <[john.taladay@bakerbotts.com](mailto:john.taladay@bakerbotts.com)>; Lucarelli, Drew <[drew.lucarelli@bakerbotts.com](mailto:drew.lucarelli@bakerbotts.com)>; kaylee.yang@nortonrosefulbright.com; Geraldine W. Young <[geraldine.young@nortonrosefulbright.com](mailto:geraldine.young@nortonrosefulbright.com)>

**Subject:** RE: In re Cathode Ray Tube (CRT) Antitrust Litigation – MDL No. 1917, Master File No. 07-CV-5944-JST

[EXTERNAL EMAIL]

Tom:

Per our discussion, could you please provide a list of Irico's additional search terms?

Thanks,  
Matt

---

**From:** Carter, Tom <[Tom.Carter@BakerBotts.com](mailto:Tom.Carter@BakerBotts.com)>

**Sent:** Thursday, October 5, 2023 11:40 AM

**To:** Matthew Heaphy <[mheaphy@saveri.com](mailto:mheaphy@saveri.com)>; Werbel, Evan <[evan.werbel@bakerbotts.com](mailto:evan.werbel@bakerbotts.com)>; Rick Saveri <[rick@saveri.com](mailto:rick@saveri.com)>; Lauren Capurro <[LaurenRussell@TATP.com](mailto:LaurenRussell@TATP.com)>

**Cc:** Geoff Rushing <[geoff@saveri.com](mailto:geoff@saveri.com)>; David Hwu <[dhwu@saveri.com](mailto:dhwu@saveri.com)>; Mario Alioto <[MAlioto@TATP.com](mailto:MAlioto@TATP.com)>; Dan Birkhaeuser <[dbirkhaeuser@bramsonplutzik.com](mailto:dbirkhaeuser@bramsonplutzik.com)>; Alan Plutzik <[aplutzik@bramsonplutzik.com](mailto:aplutzik@bramsonplutzik.com)>; Taladay, John <[john.taladay@bakerbotts.com](mailto:john.taladay@bakerbotts.com)>; Lucarelli, Drew <[drew.lucarelli@bakerbotts.com](mailto:drew.lucarelli@bakerbotts.com)>;

[kaylee.yang@nortonrosefulbright.com](mailto:kaylee.yang@nortonrosefulbright.com); Geraldine W. Young <[geraldine.young@nortonrosefulbright.com](mailto:geraldine.young@nortonrosefulbright.com)>

**Subject:** RE: In re Cathode Ray Tube (CRT) Antitrust Litigation – MDL No. 1917, Master File No. 07-CV-5944-JST

Matt, for discussion on the call at noon Pacific, please see the attached search term hit reports.

Thanks,  
Tom

---

**From:** Matthew Heaphy <[mheaphy@saveri.com](mailto:mheaphy@saveri.com)>

**Sent:** Thursday, October 5, 2023 1:42 PM

**To:** Werbel, Evan <[evan.werbel@bakerbotts.com](mailto:evan.werbel@bakerbotts.com)>; Rick Saveri <[rick@saveri.com](mailto:rick@saveri.com)>; Lauren Capurro <[LaurenRussell@TATP.com](mailto:LaurenRussell@TATP.com)>

**Cc:** Geoff Rushing <[geoff@saveri.com](mailto:geoff@saveri.com)>; David Hwu <[dhwu@saveri.com](mailto:dhwu@saveri.com)>; Mario Alioto <[MAlioto@TATP.com](mailto:MAlioto@TATP.com)>; Dan Birkhaeuser <[dbirkhaeuser@bramsonplutzik.com](mailto:dbirkhaeuser@bramsonplutzik.com)>; Alan Plutzik <[aplutzik@bramsonplutzik.com](mailto:aplutzik@bramsonplutzik.com)>; Taladay, John <[john.taladay@bakerbotts.com](mailto:john.taladay@bakerbotts.com)>; Carter, Tom <[Tom.Carter@BakerBotts.com](mailto:Tom.Carter@BakerBotts.com)>; Lucarelli, Drew <[drew.lucarelli@bakerbotts.com](mailto:drew.lucarelli@bakerbotts.com)>; [kaylee.yang@nortonrosefulbright.com](mailto:kaylee.yang@nortonrosefulbright.com); Geraldine W. Young <[geraldine.young@nortonrosefulbright.com](mailto:geraldine.young@nortonrosefulbright.com)>

**Subject:** RE: In re Cathode Ray Tube (CRT) Antitrust Litigation – MDL No. 1917, Master File No. 07-CV-5944-JST

[EXTERNAL EMAIL]

Evan:

Plaintiffs are available today at noon Pacific. Could you please circulate a call-in number?

Best,  
Matt

---

**From:** Werbel, Evan <[evan.werbel@bakerbotts.com](mailto:evan.werbel@bakerbotts.com)>

**Sent:** Wednesday, October 4, 2023 1:10 PM

**To:** Rick Saveri <[rick@saveri.com](mailto:rick@saveri.com)>; Lauren Capurro <[LaurenRussell@TATP.com](mailto:LaurenRussell@TATP.com)>

**Cc:** Geoff Rushing <[geoff@saveri.com](mailto:geoff@saveri.com)>; David Hwu <[dhwu@saveri.com](mailto:dhwu@saveri.com)>; Mario Alioto <[MAlioto@TATP.com](mailto:MAlioto@TATP.com)>; Dan Birkhaeuser <[dbirkhaeuser@bramsonplutzik.com](mailto:dbirkhaeuser@bramsonplutzik.com)>; Alan Plutzik <[aplutzik@bramsonplutzik.com](mailto:aplutzik@bramsonplutzik.com)>; Matthew Heaphy <[mheaphy@saveri.com](mailto:mheaphy@saveri.com)>; Taladay, John <[john.taladay@bakerbotts.com](mailto:john.taladay@bakerbotts.com)>; Carter, Tom <[Tom.Carter@BakerBotts.com](mailto:Tom.Carter@BakerBotts.com)>; Lucarelli, Drew <[drew.lucarelli@bakerbotts.com](mailto:drew.lucarelli@bakerbotts.com)>; [kaylee.yang@nortonrosefulbright.com](mailto:kaylee.yang@nortonrosefulbright.com); Geraldine W. Young <[geraldine.young@nortonrosefulbright.com](mailto:geraldine.young@nortonrosefulbright.com)>

**Subject:** In re Cathode Ray Tube (CRT) Antitrust Litigation – MDL No. 1917, Master File No. 07-CV-5944-JST

Lauren and Rick, Are Plaintiffs available tomorrow to meet and confer regarding the search terms for the Su investigation? How about 12:00 Pacific? If that does not work, let us know if there is another time that does.

Thanks,  
Evan

**Evan J. Werbel**

**Baker Botts L.L.P.**

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# **DOCUMENT 24**

**SAVERI & SAVERI, INC.**

706 SANSOME STREET  
SAN FRANCISCO, CALIFORNIA 94111  
TELEPHONE: (415) 217-6810  
TELECOPIER: (415) 217-6813

*Trump Alioto Trump & Prescott*

ATTORNEYS LLP  
2001 Union Street, Suite 482  
San Francisco, California 94123  
(415) 563-7200  
FAX (415) 346-0679

November 15, 2023

**VIA EMAIL**

The Honorable Vaughn R. Walker  
Law Office of Vaughn R. Walker  
Four Embarcadero Center, Suite 2200  
San Francisco, CA 94111  
vrw@judgewalker.com

Re: *In re Cathode Ray Tube (CRT) Antitrust Litigation* – MDL No. 1917,  
Master File No. 07-CV-5944-JST

**CONFIDENTIAL: SUBJECT TO PROTECTIVE ORDER**

Dear Judge Walker:

**I. Introduction**

Irico's recent productions of documents pursuant to the Court's Interim Orders<sup>1</sup> demonstrate that its representations to Plaintiffs and the Court regarding the employment status of senior executive Su Xiaohua—namely, that he resigned and severed all ties with Irico on May 25, 2022—have been false from the outset. The recent productions also show that Irico withheld (and is likely still withholding) responsive documents in violation of the Su Order<sup>2</sup> and Interim Orders to hide its deception.<sup>3</sup> The withheld evidence demonstrates:

- Mr. Su did not “retire” on May 25, 2022. Rather, he was granted early participation in an Irico program whereby senior executives who have reached

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<sup>1</sup> Order Approving Special Master's Interim Report & Recommendation on Plaintiffs' Motion for Discovery Sanctions (ECF No. 6264) (“First Interim Order”) and Order Approving as Modified Special Master's Second Interim Report & Recommendation on Plaintiffs' Motion for Discovery Sanctions (ECF No. 6324) (“Second Interim Order”).

<sup>2</sup> Order Adopting Special Master's Report & Recommendation on Irico's Failure to Produce Su Xiaohua for Deposition (ECF No. 6115) (“Su Order”).

<sup>3</sup> “Irico” refers to Defendants Irico Group Corporation (“Group”) and Irico Display Devices Co., Ltd. (“Display”). “Plaintiffs” refers to Direct Purchaser Plaintiffs (“DPPs”) and Indirect Purchaser Plaintiffs (“IPPs”).

The Honorable Vaughn R. Walker

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the age of 58 are allowed to take “off-duty and rest” status from their positions at the end of the year, but continue to be paid and employed by Irico.

- Mr. Su did not go on “off-duty and rest” status until at least June 17, 2022—*after* Irico told Plaintiffs it could not produce him, *after* his Macau visa was granted, and *after* the time his deposition was to occur.
- Irico’s claims of “surprise” are false. Mr. Su’s change to “off-duty and rest” status was a months-long process that was well known within Irico before it negotiated an extension of the Court-ordered deadline for his deposition; the withheld evidence includes another application by Mr. Su for a change in status dated May 5, 2022 that is virtually identical to his purported May 25, 2022 “resignation.”
- Irico’s claims that it did everything in its power to convince Mr. Su to testify are false; the record remains devoid of evidence of any attempt by Irico to persuade Mr. Su to appear for deposition. To the contrary, Irico rewarded Mr. Su by, *inter alia*, granting him “off-duty and rest” status ahead of schedule, allowing him to receive a substantial deferred compensation payment in July 2022, a bonus in January 2023, and a positive employment review in May 2023.
- Irico’s production confirms the Court’s finding that Irico intentionally withheld documents in violation of the Su Order—at least the *sixth* Court order it has defied—and did so to facilitate its false narrative.
- Irico continues to destroy and withhold evidence. The Declaration of John M. Taladay Regarding Compliance with Interim Orders on Plaintiffs’ Motion for Discovery Sanctions (Oct. 23, 2023) (“Taladay Declaration”) admits that Irico wiped Mr. Su’s laptop in June 2022, that Mr. Su cleared out all documents from his office, and that Mr. Su’s cell phone has not been searched.<sup>4</sup>
- Despite the dispute over the date of Mr. Su’s “resignation letter”—3/25/22 or 5/25/22—Irico has failed to provide an electronic version of the letter with metadata, or any other evidence showing when Mr. Su first applied to leave his position ahead of schedule, e.g., the communications leading to the April 7, 2022 meeting at which Group approved Su’s request to go “off-duty.”

In short, the new documents and the Taladay Declaration confirm that terminating or other severe sanctions against Irico are warranted. The new evidence shows not only

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<sup>4</sup> The Taladay Declaration is Exhibit A to the Declaration of David Hwu in Support of Plaintiffs’ Letter Brief in Further Support of Motion for Terminating or Alternative Sanctions (“Hwu Decl.”).



The Honorable Vaughn R. Walker

11/16/2023

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that Irico has no excuse for its failure to produce Mr. Su, but that it facilitated his failure to appear for deposition, violating multiple Court Orders along the way. Its continuing misrepresentations to the Court are just the latest example of its breathtaking disregard for the integrity of this proceeding and the authority of the Court. Irico's continuing discovery misconduct continues the substantial prejudice and delay the Court has already found from Irico's improper conduct, and warrants the most severe sanctions.

## **II. Background**

As the Special Master is aware, after months of negotiations, two Court orders requiring his appearance for deposition, and numerous assurances that he would appear, Irico informed Plaintiffs on June 7, 2022, that it would not produce Mr. Su for his promised deposition. ECF No. 6032-1, Ex. G. (email stating that Mr. Su had "resigned from Irico" and that "Irico has no ability to require" him to appear). Since then, Irico has insisted that it cannot be blamed for its failure to produce Mr. Su because his resignation, later characterized as "retirement," severed all ties with Irico, therefore depriving it of any means of compelling Mr. Su to testify:

The reality is that Irico never violated a court order and worked cooperatively with Plaintiffs and Mr. Su to arrange for his deposition right up to the time he resigned – months earlier than anticipated – *and terminated all relationships with Irico. At that point, Mr. Su became a former employee outside of Irico's control, and Irico's determined attempts to convince him to appear for deposition were unavailing.*

Opposition at 27 (emphasis added); *see also, e.g., id.* at 33 ("... Irico had no ability to leverage or compel Mr. Su's compliance . . . . In short, Mr. Su is a former employee over whom Irico had no control after his resignation on May 25, 2022."); Irico Surreply at 4 n.3 ("former employee outside a party's control").

On June 30, 2023, Irico filed a motion for a protective order seeking relief from the Court's Orders requiring it to produce Mr. Su and two other deponents. The Court denied the motion, holding that Irico had not shown good cause. The Court also expressly found that Irico's failure to produce Mr. Su had caused substantial prejudice to Plaintiffs and the Court. ECF No 6047 at 12–13 ("delay in the production of these witnesses unquestionably causes injury to the plaintiffs and also injury and inconvenience to the Court").

After the Court referred the issue of sanctions to him, on November 18, 2022, the Special Master issued the Su Order (adopted by the Court on December 6, 2022, at ECF No. 6115), again emphasizing the prejudice caused by Mr. Su's failure to appear:

The unavailability of a key witness who was an Irico general manager of sales and purchasing with personal knowledge of Irico's CRT meetings with

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competitors during 8-years of the class period is highly detrimental to resolution of this litigation on its merits.

Su Order at 12. The Court ordered Irico to produce a variety of categories for documents related to Mr. Su's "retirement" from Irico. *Id.* at 12–13. The Court also invited Plaintiffs to file motions for sanctions based on other conduct. *Id.* at 13. On December 20, 2022, Irico produced 32 documents totaling 141 pages. Hwu Decl. ¶ 4. Thereafter, Plaintiffs filed the Sanctions Motion and the Special Master held a hearing on July 19, 2023.

On August 4, 2023, the Special Master issued the First Interim Order finding that Irico had failed to comply with the Su Order:

Irico's production of documents in response to the Su Order appears extremely curated, incomplete and inadequate. There is no indication that Irico produced any documents from its human resources or other departments about Su's resignation and plans for transition. Nor is there any indication that Irico produced any documents from Su's emails or his computer hard drive regarding his resignation or communications regarding how and with whom Su's last date of employment was determined.

First Interim Order at 6 (footnote omitted). It required Irico's lead counsel to personally supervise another document search, including forensic examination of electronic devices, and to provide a declaration attesting to his efforts. ECF No. 6264 at 9. It also stressed that Irico faced severe sanctions. *Id.* at 7 ("Irico's continuing failure to comply with discovery orders risks terminating sanctions as well as less severe sanctions.")

Despite the Court's clear directives and warning, Irico initially refused to comply with the First Interim Order. On August 29, 2023, Irico informed the Special Master that instead of providing Mr. Su's computer and other devices to its U.S. counsel for review and analysis, it had relied on Chinese counsel and a Chinese forensic technology vendor. Second Interim Order at 2. The Special Master rejected Irico's attempt to "negotiate its way out of" the central component of the Interim Order. The Special Master explained:

. . . Ms Young's proposal would place responsibility for discovery in this matter in the hands of unqualified, unnamed individuals with no known understanding of United States discovery and legal standards. Given the history of discovery lapses in this case, Ms Young's proposal is not acceptable and would be a violation of the Interim Order.

*Id.* at 4. The Special Master again "warned that the consequence of repeatedly violating court orders includes terminating sanctions and lesser but still severe sanctions." *Id.* at 6.

Even after the Second Interim Order, Irico was not done attempting to delay and avoid compliance with the Su Order. On September 13, 2023, Irico sought and received a three-week extension of its deadline to produce documents (to October 13, 2023). ECF

The Honorable Vaughn R. Walker

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No. 6325. Shortly before this deadline, on October 9, 2023, Irico objected to the search terms Plaintiffs had submitted over a month earlier and sought an additional extension. Taladay Decl., Ex. 5 (Oct. 9, 2023 Irico Status Update and Request for Extension).

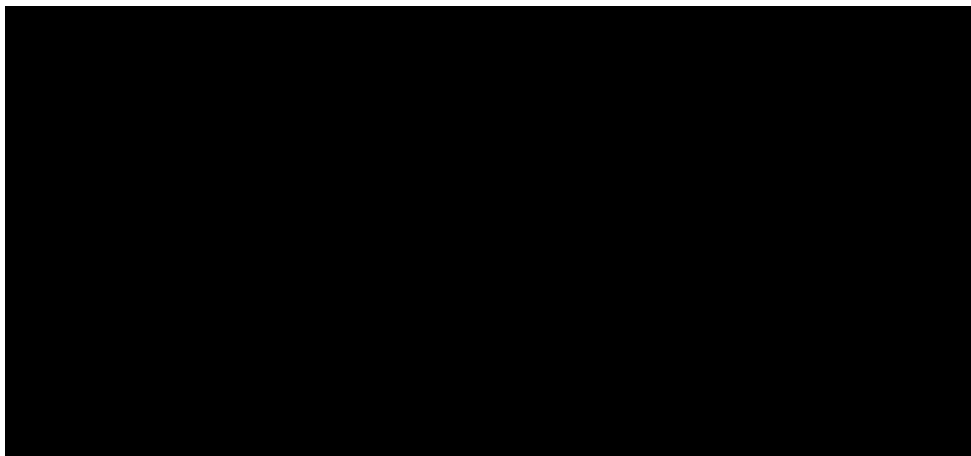
On October 13, 2023, Irico produced 135 documents totaling 233 pages. Hwu Decl. ¶ 5. Finally, on October 23, 2023, Irico produced another 484 documents totaling 1,171 pages and the Taladay Declaration. *Id.* Irico represented that its production was complete but did not review over 30,000 documents identified by Plaintiffs’ search terms. *See* Taladay Decl. ¶¶ 23, 25. The production does not include documents from Mr. Su’s cell phone, documents on the computer Mr. Su used after his old one was wiped in June 2022, documents Mr. Su removed from his office, or—with two exceptions—documents from the phones of other Irico employees. *Id.* ¶¶ 9–12, 15.

### **III. Irico’s Assertion That Mr. Su Retired On May 25, 2022 Is False.**

Contrary to Irico’s assertions, the withheld evidence makes clear that Mr. Su did not “retire,” from Irico on May 25, 2022. Instead, Mr. Su was granted unusually early participation in a program for senior executives when they reach age 58 to be given “off-duty and rest” status. Those in “off-duty and rest” status are relieved of their day-to-day responsibilities but are still paid until retirement at age 60. Normally, “off-duty and rest” status is available, if at all, only in December of the year the individual turns 58. Hwu Decl., Ex. B (IRI-SU-000402–03E). Mr. Su turned 58 in March 2022, thus he was not eligible until December 2022. *Id.*, Ex. C (IRI-SU-000400E). Moreover, Irico frequently delayed the granting of such status by a year or more. In Mr. Su’s case, however, Irico allowed him the benefits of this program before he was entitled to it without any attempt to compel his testimony.

#### **A. Mr. Su Did Not Retire from Irico.**

A May 9, 2022, document authored by Hao Li, Director of Company Office of Xianyang Irico Group Industrial Co., Ltd. (“Irico Industrial”) explains that the change in Mr. Su’s status is to “off-duty and rest” status, and that under Irico policy he was ineligible for “off-duty and rest” status until December 2022:

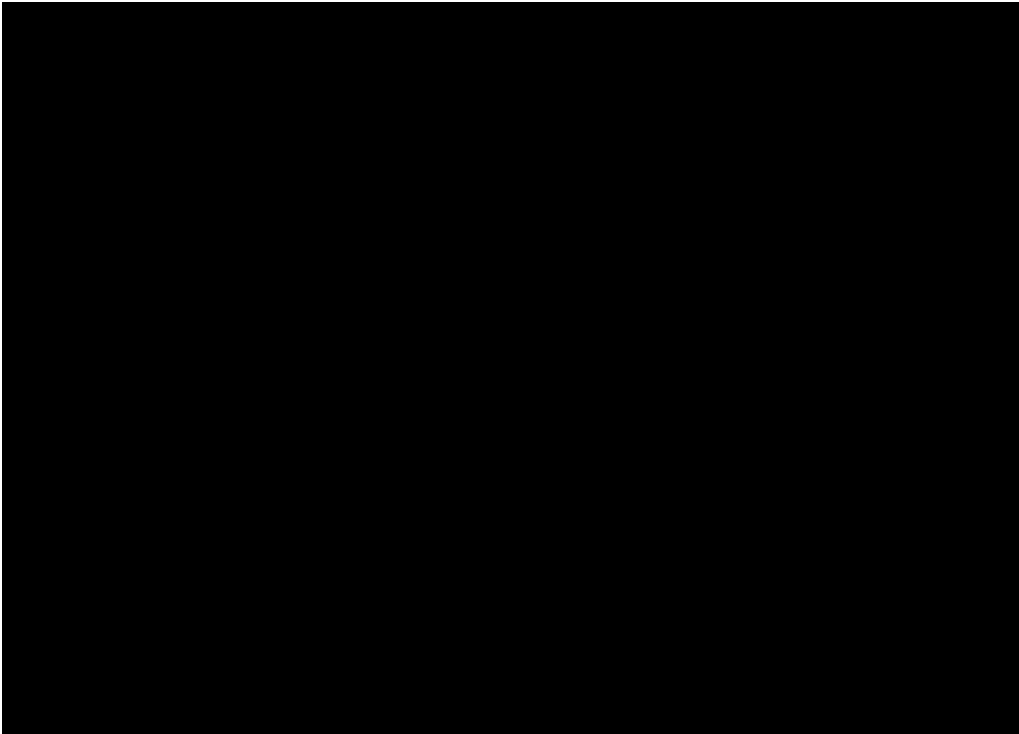


***CONFIDENTIAL: SUBJECT TO PROTECTIVE ORDER***

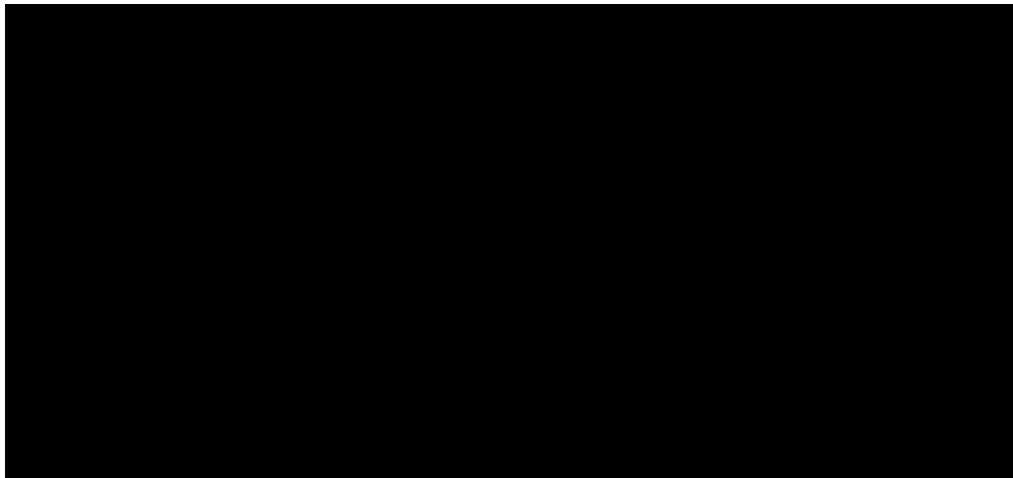
The Honorable Vaughn R. Walker

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*Id.* ¶ 6, Ex. B at IRI-SU-000402E. The document attached Mr. Su's application (dated May 5, 2022) to Irico Industrial, the Irico entity that managed Mr. Su's appointments:



*Id.* at IRI-SU-000403E; Taladay Decl. ¶ 13. This application is almost identical to the March 25, 2022 document (Hwu Decl., Ex. D (IRI-SU-000141E) (date disputed)) he submitted in advance of Group's approval of his change in status on April 7, 2022. *Id.*, Ex. E (IRI-SU-000137E–40E).<sup>5</sup>

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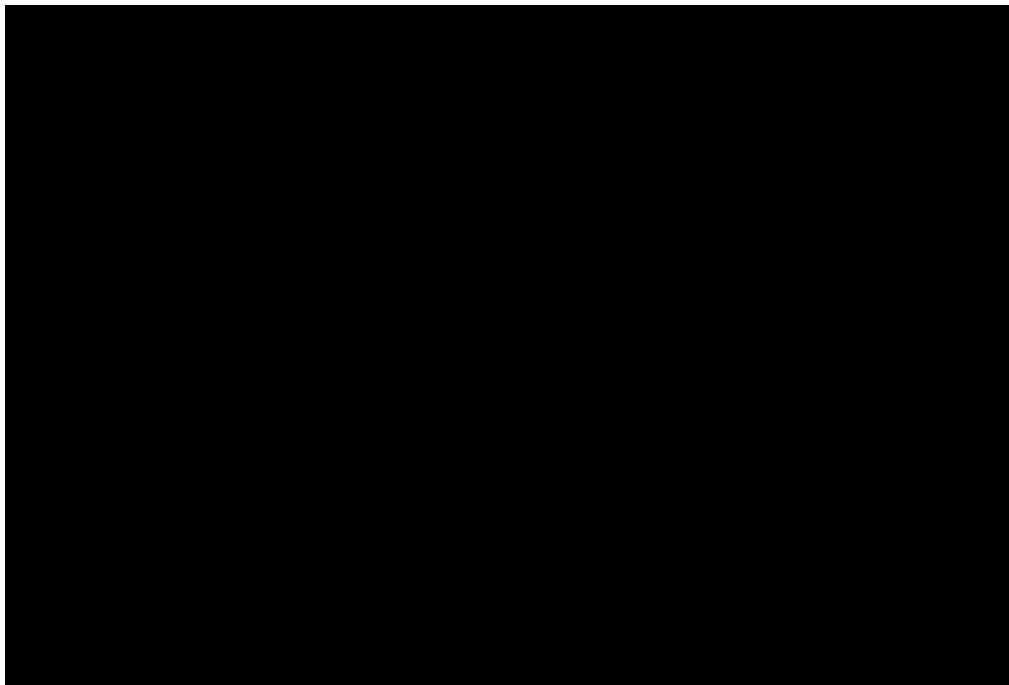
<sup>5</sup> Irico maintains that the date of this document was actually May 25, 2022, but has not produced any other pre-April 7, 2022 notice from Mr. Su which could have precipitated the consideration of his request on April 7, 2022. *See* Opposition at 32 & n.11. Irico has failed to produce any metadata or other information confirming a date of May 25, 2022.

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Internal text messages between Irico Foshan Admin and HR Director Xu Jinmei and a colleague confirms that Mr. Su did not retire and that Irico considered him an “in-service” employee after his change in status:



Hwu Decl., Ex. F (IRI-SU-0001356E) (2/24/2023 text messages) (emphasis added).

Finally, Irico’s early grant of “off-duty and rest” status to Mr. Su was unusual. Irico commonly delayed participation in the program for eligible managers a year or more. An Irico Group HR document explains that the age limit for a manager to hold positions is reached in December of the year he turns 58. Hwu Decl., Ex. G (IRI-SU-000415–17E at 16E). Nevertheless, Irico has discretion to keep such managers at their posts: Out of nine managers who became eligible in 2021 and 2022, Irico delayed five from going off-duty by a year or more. *Id.* at 16–17E.

**B. Mr. Su’s Status Did Not Change Until After Irico Falsely Asserted He Had Resigned.**

The withheld documents also show that the process by which Mr. Su obtained “off-duty and rest” status began at least by early April 2022 and was not complete until well after Irico’s representation on June 7, 2022 that he had resigned. This representation was thus doubly false—Mr. Su’s employment continued and his status was unchanged.

The process to grant Mr. Su early “off-duty and rest” status required approvals from multiple parties—including Group, Irico Industrial, and Irico Industrial’s Party Committee. *See* Hwu Decl., Exs. H (IRI-SU-000208E), I (IRI-SU-001446E), B (IRI-SU-000402–03E). As discussed previously, Group officially approved Mr. Su’s change in

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status on April 7, 2022, apparently in response to Mr. Su's March 25, 2022, request. Hwu Decl., Exs. D, E. On April 13, 2022, Shi Feng, Group's head of Human Resources noted the next two steps. Hwu Decl., Ex. I (IRI-SU-001446E) [REDACTED]

[REDACTED]). Mr. Shi's text confirms that Group leadership was aware of Mr. Su's pending status change. *Id.*

As noted above, Mr. Su next submitted an almost identical request to Irico Industrial on May 5, 2022. Hwu Decl., Ex. B (IRI-SU-000402-03E at 03E). And on May 9, 2022, Irico Industrial's Company Office drafted a proposal for Mr. Su's change in status for the Company Party Committee. *Id.*

Multiple Irico documents show that Mr. Su did not formally leave his managerial positions until June 17, 2022, at the earliest. *See, e.g., id.*, Exs. H (IRI-SU-000208E), J (IRI-SU-000421-23E at 23E). Other documents, however, indicate that he did not leave his position until July. *Id.*, Ex. F (IRI-SU-0001356E).

This series of events demonstrates beyond doubt that Irico's claim that it did its utmost to convince Mr. Su to testify is false. There is no evidence of any attempt to compel his appearance at deposition. It also demonstrates that Mr. Su's pending change in status was no surprise. Senior executives were aware of his pending change in status from as early as April; Mr. Su's substantially identical request of May 5, 2022, by itself demonstrates Irico's awareness well before it negotiated the May 25, 2022, extension of its deadline to produce him. *See* ECF No. 6016.

### **C. Mr. Su Continued to Be Paid and Perform Work for Irico.**

The documents Irico withheld in violation of the Court's orders also establish beyond dispute that Irico continued to pay Mr. Su—and possibly still does—and that Mr. Su continued to work for Irico. Irico's representations that Mr. Su "terminated all relationships with Irico" is false for this reason as well.

#### **1. Irico Continued To Pay Mr. Su.**

The recently produced documents show that Irico has continued to pay Mr. Su, including discretionary lump sum payments and benefits. First, Mr. Su remains on Irico's payroll. Through at least August 2023, he received monthly payments of RMB 6,000, plus his housing fund contributions and his pension, health, and unemployment insurance premiums. Hwu Decl., Ex. K (IRI-SU-001467E). Although Irico's records are not complete, it appears likely that he remains on Irico's payroll even now given that he is not yet 60. *Id.*, Ex. G (IRI-SU-000415-17E at 17E).

Second, Irico made discretionary payments to Mr. Su. Despite claiming in its Opposition (at p. 27) that it exhorted Mr. Su to testify, Irico paid Mr. Su deferred

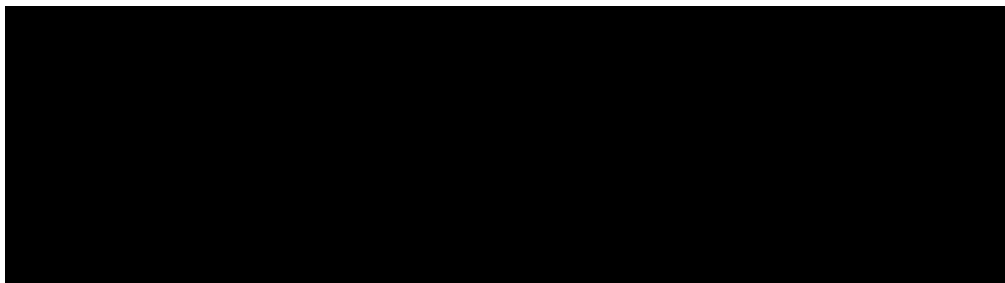
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compensation of RMB 121,600 in July 2022. Hwu Decl., Ex. L (IRI-SU-000845E). Further, texts in October 2022 show that Irico planned another deferred compensation payment for time served in 2022 before he went off-duty. *Id.*, Ex. M (IRI-SU-001344E).

Third, Irico paid Mr. Su a bonus in January 2023. *Id.*, Ex. J (IRI-SU-000421–23E at 23E). Irico rules barred employees with absenteeism or subject to disciplinary action from receiving the bonus, suggesting Su committed neither and was in good standing with the company. *Id.* at 22E. Irico also commended Mr. Su in a May 2023 performance review:



*Id.*, Ex. N (IRI-SU-000190E, 97E, 98E at 97E). Notably, the report makes no mention of Mr. Su’s “surprise resignation” or refusal to cooperate with this litigation. *Id.* at 98E.

In short, Irico’s claims that it severed all ties with Mr. Su and that it lacked any leverage to compel his testimony are simply false. Indeed, the contrary appears to be true. Far from seeking to compel his testimony, Irico rewarded Mr. Su’s “recalcitrance.”

## **2. Mr. Su Continued To Work For Irico.**

It is also clear that Mr. Su continued to work for Irico. He continued to be involved in the business of Irico Foshan at least through September 2022. *Id.* ¶ 19, Ex. O (IRI-SU-000199E, 165E) (screenshots of WeChat messages between Mr. Su and Irico Foshan CFO Wang Jijun).<sup>6</sup> Mr. Su continued working on a different computer after Irico wiped his old one on June 15, 2022. *Id.* at 165E (“\*WeChat desktop version\*”). He authored and sent work documents to Wang Jijun through WeChat. *Id.* Mr. Su had his secretary deliver financial authorization documents to Wang Jijun on July 31, 2022. Hwu Decl. ¶ 21, Ex. Q (IRI-SU-000188). On June 7, 2022, the day Irico’s counsel informed Plaintiff of Mr. Su supposed resignation on May 25, he was receiving and approving employee requests to apply company seals for work. *Id.*, Ex. R (IRI-SU-001454).

In addition, Mr. Su was on the Board of Century Shuanghong (an Irico joint venture) through at least August 18, 2023. *Id.*, Ex. S (IRI-SU-001450E). Mr. Su, along with Group General Counsel Yan Yunlong, also served on the Board of Directors of Orion Co., owned by Century Shuanghong, until at least October 2022. *See id.*, Ex. T

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<sup>6</sup> Mr. Su also wine and dined with Irico executives. Hwu Decl. ¶ 20, Ex. P (IRI-SU-000177E) (6/16/2022 WeChat messages with Wang Jijun).



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(IRI-SU-000233E, 236E). Mr. Su continued to use his Irico email account, sxh@ch.com.cn, through at least October 2022. *See id.* at 233E.

#### **IV. Irico Continues To Defy The Court's Orders.**

Irico's recent production confirms the Court's finding that its initial production in response to the Su Order—a mere 32 documents—was grossly and intentionally inadequate. As the Court suspected, it was plainly “curated” to facilitate Irico's false narrative regarding its refusal to produce Mr. Su for deposition—namely, that Mr. Su suddenly “retired” and severed all ties with Irico. *See* First Interim Order at 6.

In addition, the productions and the Taladay Declaration establish that Irico continues to destroy and withhold evidence. Irico admits that it wiped Mr. Su's computer on June 15, 2022, and, as a result, only 22 documents originating from that computer were retrieved. *See* Taladay Decl. ¶¶ 6–7, 24 n.3. Nor did Irico search Mr. Su's current computer, which he began using for work soon after his old one was reformatted. *see id.*, Ex. 3 (IRI-SU-000202E Translated Transcript of Audio File) (“Since later I joined another company in Shenzhen as an executive. This (computer) saved lots of (information) of that company as well . . .”). Mr. Su refused Wang Zhaojie's offer to only retrieve files related to his work in Foshan. *Id.*

Nor did Irico search Mr. Su's cell phone which Mr. Su continued to use for work after June 2022. *See* Hwu Decl., Ex. O (IRI-SU-000199E, 165E). Similarly, Mr. Su removed all files from his office when he departed Irico Foshan, apparently without subjecting any of his files to searches for documents. *Id.* ¶ 10. Indeed, it appears that Mr. Su has been allowed to refuse to cooperate in any fashion without any consequence.

Finally, Irico's search of other employees' phones was also incomplete and Irico did not review over 30,000 documents Plaintiffs' search terms hit on. *See* Taladay Decl. ¶¶ 15, 23, 25.

#### **V. Conclusion**

For the foregoing additional reasons, Plaintiffs respectfully request that the Special Master grant their motion for terminating sanctions as set forth in their motion. *See* Motion at 29–33; Reply Brief at 24–29. It is beyond argument that Irico's misconduct throughout this case has been intentional, beyond any conceivably acceptable limits, and has caused Plaintiffs irreparable prejudice.

Very truly yours,

/s/ R. Alexander Saveri

R. Alexander Saveri  
Lead Counsel for Direct Purchaser Plaintiffs

***CONFIDENTIAL: SUBJECT TO PROTECTIVE ORDER***



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*/s/ Mario N. Alioto*

Mario N. Alioto

Lead Counsel for Indirect Purchaser Plaintiffs

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***CONFIDENTIAL: SUBJECT TO PROTECTIVE ORDER***

# **DOCUMENT 25**

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2 Geoffrey C. Rushing (126910)  
grushing@saveri.com  
3 Matthew D. Heaphy (227224)  
mheaphy@saveri.com  
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706 Sansome Street  
6 San Francisco, CA 94111  
Telephone: (415) 217-6810  
7 Facsimile: (415) 217-6813

8 *Lead Counsel for Direct Purchaser Plaintiffs*

9  
10 **UNITED STATES DISTRICT COURT**  
11 **NORTHERN DISTRICT OF CALIFORNIA**  
12 **OAKLAND DIVISION**

13 IN RE: CATHODE RAY TUBE (CRT)  
14 ANTITRUST LITIGATION

Master File No. 07-CV-5944-JST

MDL No. 1917

15 This Document Relates to:

16 *ALL DIRECT PURCHASER ACTIONS*

17 *ALL INDIRECT PURCHASER ACTIONS*

**DECLARATION OF DAVID Y. HWU IN  
SUPPORT OF PLAINTIFFS' LETTER  
BRIEF IN FURTHER SUPPORT OF  
MOTION FOR TERMINATING OR  
ALTERNATIVE SANCTIONS AGAINST  
DEFENDANTS IRICO GROUP CORP. AND  
IRICO DISPLAY DEVICES CO., LTD.**

Special Master: Hon. Vaughn R. Walker (Ret.)

1 I, David Y. Hwu, declare:

2 1. I am an attorney at Saveri & Saveri, Inc., Lead Counsel for Direct Purchaser  
3 Plaintiffs (“DPPs”) in this action. I am a member of the Bar of the State of California and admitted  
4 to practice in the Northern District of California. I have been involved in many aspects of this case  
5 since 2011. I make this Declaration in Support of Plaintiffs’ Letter Brief in Further Support of  
6 Motion for Terminating or Alternative Sanctions Against Defendants Irico Group Corporation and  
7 Irico Display Devices Co., Ltd. Except as otherwise stated, I have personal knowledge of the facts  
8 stated below.

9 2. I am fluent in Mandarin Chinese.

10 3. Attached hereto as Exhibit A is a true and correct copy of the Declaration of John  
11 M. Taladay Regarding Compliance with Interim Orders on Plaintiffs’ Motion for Discovery  
12 Sanctions, dated October 23, 2023.

13 4. On December 20, 2022, Irico electronically produced 32 documents totaling 141  
14 pages responsive to the Court’s Order Adopting Special Master’s Report & Recommendation on  
15 Irico’s Failure to Produce Su Xiaohua for Deposition (ECF No. 6115). The production was  
16 identified as IRI-SU001 and contained Bates-stamped documents labeled IRI-SU-000001 through  
17 IRI-SU-000141.

18 5. On October 13, Irico produced 135 documents totaling 233 pages. It was identified  
19 as IRI-SU002 and contained Bates-stamped documents IRI-SU-000142 through IRI-SU-000374.  
20 On October 23, 2023, Irico electronically produced 484 documents totaling 1,171 pages. The  
21 production was identified as IRI-SU003 and contained Bates-stamped documents labeled IRI-SU-  
22 000375 through IRI-SU-001545.

23 6. Attached hereto as Exhibit B is a true and correct copy of a document produced in  
24 this litigation by Irico bearing the Bates numbers IRI-SU-000402 through IRI-SU-000403, and a  
25 certified translation thereof. According to metadata produced by Irico, this document was authored  
26 by Hao Li, identified by Irico as Director of Company Office of Xianyang Irico Group Industrial  
27 Co, Ltd.

28 7. Attached hereto as Exhibit C is a true and correct copy of a document produced in

1 this litigation by Irico bearing the Bates number IRI-SU-000400, and a certified translation thereof.

2 8. Attached hereto as Exhibit D is a true and correct copy of a document produced in  
3 this litigation by Irico bearing the Bates number IRI-SU-000141, and a certified translation thereof.  
4 A copy of this document was previously attached as Exhibit UU to the Declaration of Lauren C.  
5 Capurro in Support of Plaintiffs Motion for Sanctions Against Irico Group Corporation and Irico  
6 Display Devices Co., Ltd. (“Capurro Declaration”).

7 9. Attached hereto as Exhibit E is a true and correct copy of a document produced in  
8 this litigation by Irico bearing the Bates numbers IRI-SU-000137 through IRI-SU-000140, and a  
9 certified translation thereof. A copy of this document was previously attached as Exhibit TT to the  
10 Capurro Declaration.

11 10. Attached hereto as Exhibit F is a true and correct copy of a document produced in  
12 this litigation by Irico bearing the Bates number IRI-SU-0001356, and a certified translation  
13 thereof. It was produced in native format and has been converted to a PDF file to which Bates  
14 numbering has been added.

15 11. Attached hereto as Exhibit G is a true and correct copy of a document produced in  
16 this litigation by Irico bearing the Bates numbers IRI-SU-000415 through IRI-SU-000417, and a  
17 certified translation thereof.

18 12. Attached hereto as Exhibit H is a true and correct copy of a document produced in  
19 this litigation by Irico bearing the Bates number IRI-SU-000208, and a certified translation thereof.

20 13. Attached hereto as Exhibit I is a true and correct copy of a document produced in  
21 this litigation by Irico bearing the Bates number IRI-SU-001446, and a certified translation thereof.  
22 It was produced in native format and has been converted to a PDF file to which Bates numbering  
23 has been added.

24 14. Attached hereto as Exhibit J is a true and correct copy of a document produced in  
25 this litigation by Irico bearing the Bates numbers IRI-SU-000421 through IRI-SU-000423, and a  
26 certified translation thereof.

27 15. Attached hereto as Exhibit K is a true and correct copy of a document produced in  
28 this litigation by Irico bearing the Bates number IRI-SU-001467, and a certified translation thereof.

1           16. Attached hereto as Exhibit L is a true and correct copy of an excerpt of a document  
2 produced in this litigation by Irico bearing the Bates number IRI-SU-000845, and a certified  
3 translation thereof. It was produced in native format and contained seven tabs, only one of which –  
4 “7月” (July) – has been converted to a PDF file and to which Bates numbering has been added.

5           17. Attached hereto as Exhibit M is a true and correct copy of a document produced in  
6 this litigation by Irico bearing the Bates number IRI-SU-001344, and a certified translation thereof.  
7 It was produced in native format and has been converted to a PDF file to which Bates numbering  
8 has been added.

9           18. Attached hereto as Exhibit N is a true and correct copy of excerpts of a document  
10 produced in this litigation by Irico bearing the Bates numbers IRI-SU-000190, IRI-SU-000197, and  
11 IRI-SU-000198, and a certified translation thereof.

12           19. Attached hereto as Exhibit O is a true and correct copy of a document produced in  
13 this litigation by Irico bearing the Bates numbers IRI-SU-000199 and IRI-SU-000165, and a  
14 certified translation thereof. These two pages were produced out of order and have been reordered  
15 accordingly. According to metadata produced by Irico, this document was collected from the  
16 custodial files of Wang Jijun, identified by Irico as Chief Financial Officer of Irico (Foshan) Flat  
17 Panel Display Co., Ltd., and positions in other companies.

18           20. Attached hereto as Exhibit P is a true and correct copy of a document produced in  
19 this litigation by Irico bearing the Bates number IRI-SU-000177, and a certified translation thereof.  
20 According to metadata produced by Irico, this document was also collected from the custodial files  
21 of Wang Jijun.

22           21. Attached hereto as Exhibit Q is a true and correct copy of a document produced in  
23 this litigation by Irico bearing the Bates number IRI-SU-000188, and a certified translation thereof.  
24 According to metadata produced by Irico, this document was also collected from the custodial files  
25 of Wang Jijun.

26           22. Attached hereto as Exhibit R is a true and correct copy of a document produced in  
27 this litigation by Irico bearing the Bates number IRI-SU-001454, and a certified translation thereof.  
28 It was produced in native format and has been converted to a PDF file to which Bates numbering

1 has been added.

2 23. Attached hereto as Exhibit S is a true and correct copy of a document produced in  
3 this litigation by Irico bearing the Bates number IRI-SU-001450, and a certified translation thereof.  
4 It was produced in native format and has been converted to a PDF file to which Bates numbering  
5 has been added.

6 24. Attached hereto as Exhibit T is a true and correct copy of documents produced in  
7 this litigation by Irico bearing the Bates numbers IRI-SU-000233 (email) and IRI-SU-000236 (one  
8 of three attachments), and certified translations thereof.

9  
10 I declare under the penalty of perjury under the laws of the United States of America that  
11 the foregoing is true and correct.

12 Executed this 16th day of November, 2023 in San Francisco, California.

13  
14 /s/ David Y. Hwu  
David Y. Hwu

# **EXHIBIT A**



1 John M. Taladay (*pro hac vice*)  
2 Evan J. Werbel (*pro hac vice*)  
3 Thomas E. Carter (*pro hac vice*)  
4 Andrew L. Lucarelli (*pro hac vice*)  
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11 evan.werbel@bakerbotts.com  
12 tom.carter@bakerbotts.com  
13 drew.lucarelli@bakerbotts.com

8 *Attorneys for Defendants Irico Group Corp. and*  
9 *Irico Display Devices Co., Ltd.*

10  
11  
12  
13 **UNITED STATES DISTRICT COURT**  
14 **NORTHERN DISTRICT OF CALIFORNIA**  
15 **OAKLAND DIVISION**

16 IN RE: CATHODE RAY TUBE (CRT)  
17 ANTITRUST LITIGATION

Master File No. 07-CV-5944-JST

MDL No. 1917

18 This Document Relates to:

19 *ALL INDIRECT PURCHASER ACTIONS*  
20 *ALL DIRECT PURCHASER ACTIONS*

**DECLARATION OF JOHN M. TALADAY  
REGARDING COMPLIANCE WITH  
INTERIM ORDERS ON PLAINTIFFS'  
MOTION FOR DISCOVERY SANCTIONS**

21 Judge: Honorable Jon S. Tigar  
22  
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1 I, John M. Taladay, declare as follows:

2 1. I am a member of the bar of the District of Columbia and admitted to practice before  
3 this Court *pro hac vice*. I am an attorney with Baker Botts L.L.P., which represents Defendants  
4 Irico Group Corporation (“Irico Group”) and Irico Display Devices Co., Ltd. (“Irico Display,”  
5 collectively, “Irico” or the “Irico Defendants”) in this action. I make this Declaration in support of  
6 Irico Defendants’ Submission in Response to the Orders Adopting the Special Master’s First and  
7 Second Interim Reports and Recommendations on Plaintiffs’ Motion for Discovery Sanctions. *See*  
8 ECF Nos. 6264 (“First Interim Order”); 6324 (“Second Interim Order,” collectively the “Orders”).  
9 If called as a witness, I could and would testify to the matters set forth in this declaration of my  
10 own personal knowledge.

11 2. As directed by the Special Master in the Second Interim Order, I submit this  
12 declaration to describe the steps taken under my direction and control to comply with the Special  
13 Master’s Orders requiring discovery into certain matters regarding Su Xiaohua as well as to detail  
14 other tasks completed as required by the Orders.

15 **Su Laptop, Other Devices and Documents**

16 3. At my direction, Thomas Carter, a Baker Botts attorney of record for Irico, traveled  
17 to China on September 10, 2023, along with Eric Chuang, a bilingual U.S.-based forensic  
18 collection specialist from BDO, a U.S. discovery vendor experienced in discovery of electronically  
19 stored information. *See Forensic Technology Services*, BDO USA, P.C. (last accessed Oct. 23,  
20 2023), <https://www.bdo.com/services/advisory/forensics-investigations/forensics-technology>.

21 4. Mr. Carter took physical custody of Mr. Su’s former laptop on September 12, 2023,  
22 and personally oversaw BDO’s imaging of the complete content of the laptop’s solid-state drive.  
23 BDO utilized Forensic Falcon Neo, a digital forensic imaging hardware device manufactured by  
24 Logicube, a well-known product in the forensic industry, to duplicate the solid-state drive, which is  
25 the same imaging equipment and software as is typically used for BDO’s U.S. forensic collections  
26 in litigation matters.

27 5. Mr. Carter then oversaw BDO’s forensic analysis of all recovered files from Mr.  
28 Su’s former laptop. BDO utilized Encase Forensic Software manufactured by Guidance Software,

1 a well-known product in the forensic industry, for the data recovery procedure, which is typically  
2 used for BDO's U.S. forensic collections in litigation matters.

3 6. Until leaving his position at Irico, Mr. Su most recently served as the General  
4 Manager of Irico (Foshan) Flat Panel Display Co., Ltd. ("Irico Foshan") located in the city of  
5 Foshan, China, where Mr. Su's former office was located. Based on information provided by Irico,  
6 we understand that Mr. Su's laptop was issued to him by Irico Foshan around the time he was first  
7 employed by that company beginning on December 31, 2019. BDO's analysis showed that the  
8 solid-state drive of Mr. Su's laptop had been reformatted on June 15, 2022 and a new copy of  
9 Microsoft Windows was installed at that time.<sup>1</sup> Based on Baker Botts' investigation this was done  
10 in connection with the repurposing of Mr. Su's laptop for use by his successor as General Manager,  
11 Zhang Jiming, who took possession of Mr. Su's former laptop when he assumed Mr. Su's former  
12 position. Based on interviews with Irico employees, we understand that Zhang Dongling, the  
13 Operations and Management Director for Irico Foshan, was responsible for repurposing the laptop  
14 for use by Zhang Jiming.

15 7. A report detailing the results of BDO's forensic analysis is attached as Exhibit 1.  
16 BDO recovered a total of 28,555 files with metadata dates within the time period in which Mr. Su  
17 potentially had use of the laptop, the vast majority of which were system files. Following de-  
18 duplication and removal of non-user created system files, approximately 9,000 files remained, prior  
19 to application of search terms. These files were transferred by BDO to a China-based Relativity  
20 server so that BDO could process and apply search terms to the data and to enable a state secret  
21 review before any materials were released to Baker Botts as described below.

22 8. I also instructed BDO to collect data from corporate servers containing Mr. Su's  
23 emails and internal text messages.

24 9. Also under my direction, Baker Botts and BDO investigated whether Mr. Su had  
25 any other company-issued or company-controlled devices other than his former laptop and  
26 determined that he did not.

27  
28 <sup>1</sup> We note that, at that time, the laptop and its contents were not subject to any discovery order.

10. Baker Botts and BDO also investigated whether there were any remaining hard copy files in or from Mr. Su's office and determined no such files existed. Mr. Su's successor, Zhang Jiming, had moved into Mr. Su's office more than a year ago, and he informed Mr. Carter that the office was empty when he moved in. Other Irico Foshan employees also confirmed that Mr. Su had removed any files from his office prior to his departure.

#### **Efforts to Contact Mr. Su**

11. [REDACTED]  
[REDACTED]  
[REDACTED]. See Ex. 2 (IRI-SU-000219E). In August, after the issuance of the First Interim Order but prior to the Second Interim Order, Zhang Wenkai, Irico's Assistant General Counsel, contacted Mr. Su by phone on a few occasions to seek his cooperation with responding the Orders. Mr. Su spoke briefly to Mr. Zhang, but on the final occasion, [REDACTED], Mr. Su insisted that that he not be contacted any further regarding this litigation. Mr. Zhang recorded this call, and we have attached a transcript of that discussion. See Ex. 3 (IRI-SU-000202E).

12. Despite Mr. Su's explicit request, pursuant to the Second Interim Order, Baker Botts attempted to contact Mr. Su on October 3, 2023, by sending a message through Mr. Zhang to Mr. Su via WeChat, a commonly used communication app in China, requesting to speak with Mr. Su regarding the issues raised in the Orders. Mr. Su did not respond to that request. See Ex. 4 (IRI-SU-000229E). Thus, we were not able to secure any cooperation by Mr. Su in connection with the current discovery initiative under the First and Second Interim Orders.

#### **Interviews of Other Irico Employees**

13. Under my direction and based on their positions or other information suggesting a potential connection to Mr. Su, Mr. Carter, together with bilingual BDO staff, interviewed 23 current or former employees of Irico Group and its subsidiaries. These individuals included: (1) human resources staff and department heads at Irico Group, Xianyang Irico Group Industrial Co., Ltd. ("Irico Industrial," the Irico subsidiary that directly managed Mr. Su's management appointments), and Irico Foshan; (2) top management at Irico Group, Irico Industrial, and Irico Foshan, including the four individuals whose names are set forth in the April 7, 2022, meeting

1 minute approving Mr. Su's resignation request; (3) former subordinates of Mr. Su at Irigo Foshan;  
2 (4) personnel at Irigo Group and Irigo Industrial responsible for ministerial drafting and approving  
3 official personnel paperwork; (5) members of the Irigo Group legal department; and (6)  
4 information technology personnel at Irigo Group.

5 14. These interviews covered topics relevant to the Orders, including interviewees'  
6 knowledge of Mr. Su's deposition, Mr. Su's departure from Irigo, Mr. Su's current employment,  
7 any ongoing relationship between Irigo and Mr. Su, communications with Mr. Su, information  
8 regarding other individuals who may have relevant knowledge, and potential locations of  
9 responsive documents. Mr. Carter reported to me regarding relevant information learned in these  
10 interviews.

#### 11 **Collection of Materials from Interviewees and Relevant Departments**

12 15. In each interview described above, on my instruction, Mr. Carter also inquired and  
13 attempted to determine whether the employee had any documents or personal communications  
14 responsive to the Orders that were not preserved on the corporate servers. As detailed below, Mr.  
15 Carter and BDO determined that emails and internal text messages would be preserved on  
16 corporate servers. If any interviewee indicated that they had responsive company documents not  
17 preserved on these corporate servers, all of those materials were collected by BDO. In some cases,  
18 the interviewees indicated that they had WeChat communications that might be responsive to the  
19 Orders on individual employee-owned phones (over which the company has no control) rather than  
20 on company devices or servers. Though none of interviewees would agree to provide their  
21 personal phones for forensic imaging and not all employees still had copies of their potentially  
22 relevant WeChat messages, those interviewees who stated that they still had relevant WeChat  
23 messages provided screen shots of those messages to BDO. All materials provided by these  
24 witnesses were given to BDO, and BDO loaded the documents to the China-based Relativity  
25 server.

26 16. Other specific materials required by the Orders were also collected directly (on a  
27 "go get" basis) from relevant departments such as human resources (e.g., Mr. Su's employment  
28

1 contract) and accounting (i.e., payment records). BDO loaded these materials onto the China-  
2 based Relativity server.

### 3 **Collection of Emails and Internal Text Messages from Corporate Servers**

4 17. After consultation with Mr. Carter regarding his interviews, I identified 15  
5 custodians (14 interviewees and Mr. Su) who appeared reasonably likely to have responsive  
6 electronic communications.<sup>2</sup> I then instructed BDO to collect all emails and internal text messages  
7 in the relevant time frame from the corporate servers for those custodians for further review. *See*  
8 Ex. 5 (Oct. 9, 2023, Letter Request to Special Master), Attachment A.

9 18. BDO worked with relevant information technology personnel responsible for  
10 maintaining the company servers to execute on this instruction. Email data and internal text  
11 message data were stored on different servers, so this effort required separate collections by BDO.

12 19. Regarding the emails, only 14 of the 15 custodians had mailboxes on the corporate  
13 server. Xu Jinmei, the Administration and HR Director at Irigo Foshan, did not have a company  
14 email address. In addition, the email box of Wang Jijun, while it existed on the server, was empty.  
15 The email box of Mr. Su was maintained on the server and data was collected.

16 20. Date filters were applied prior to collection based on the role of each custodian:  
17 January 1, 2021, through September 1, 2023 (or the last day of their employment with any Irigo  
18 company), for any custodian with potential knowledge or involvement regarding Mr. Su's  
19 requested deposition; and January 1, 2022, through September 1, 2023 (or the last day of their  
20 employment with any Irigo company), for all other custodians, i.e., those custodians who were  
21 identified only because of potential knowledge or involvement relating to Mr. Su's departure. The  
22 data from the 13 available email boxes were transferred from the server to an external hard drive by  
23 BDO.

24 21. Regarding the internal text messages, data was identified for all 15 custodians,  
25 including Mr. Su. The same date filters described above regarding the email collection also were  
26

27  
28 <sup>2</sup> The other nine individuals interviewed had incidental information or de minimis roles regarding  
Mr. Su's departure or application to travel for deposition.

1 applied to the internal text message data. The internal text message data was transferred from the  
2 server to an external hard drive by BDO.

3 22. BDO loaded the data from the external hard drives onto the China-based Relativity  
4 server. The available data for the 15 custodians gathered by BDO totaled 16,409 email files  
5 (including attachments) and 56,325 internal text message files (including attachments), a total of  
6 72,734 files.

### 7 **Application of Search Terms**

8 23. BDO, at my direction, applied search terms to the server data to attempt to narrow  
9 the materials to those most likely to be responsive to the Orders. BDO utilized standard search  
10 methodologies regularly utilized in the forensic searching in the US, pursuant to instructions from  
11 Baker Botts. To determine the search terms to apply, Baker Botts utilized the search terms that it  
12 identified, combined with the generic and unqualified search terms provided by Plaintiffs on  
13 September 7, 2023. As noted in our letter request submitted to the Special Master on October 9,  
14 2023, Plaintiffs' search terms omitted any requirement that the search terms be related in any way  
15 to Mr. Su: i.e., they failed to include any "Su qualifier" such as a variation of his name, employee  
16 ID number, citizen ID number or email address. For example, Plaintiffs' unqualified search terms  
17 hit on all documents sent or received by all custodians over a 20 to 32-month period that mention  
18 the word "leadership" irrespective of whether the document had any mention of, or relevance to,  
19 Mr. Su. As a result, the initial application of all of Plaintiffs' search terms resulted in hits on over  
20 40,000 documents – 55% of every message or document sent or received by every custodian during  
21 this 20 to 32-month period – a clear sign that the unqualified search terms were grossly overbroad  
22 in the context of a specific search that is wholly and solely directed at the circumstances of Mr.  
23 Su's departure and deposition. Moreover, reviewing all documents hitting on the unqualified  
24 search terms could not conceivably be accomplished in the required time frame for production,  
25 even with the extension sought by Irico in its letter request of October 9, 2023.

26 24. I then instructed BDO to again apply Baker Botts' and Plaintiffs' combined search  
27 terms, but this time applying the "Su qualifiers" to target those documents with some potential  
28 relevance to Mr. Su. *See* Ex. 5 (Oct. 9, 2023, Letter Request to Special Master) at 4-6,

1 Attachments C-F. However, for the data collected from Mr. Su's laptop, BDO applied all of  
2 Plaintiffs' search terms and Baker Botts' search terms without the application of any "Su  
3 qualifiers." In total, this effort resulted in approximately 9,400 files, which BDO then processed  
4 for further review.<sup>3</sup>

5 25. Irico and the Plaintiffs have disagreed on the use of "Su qualifiers" to narrow the  
6 collection of relevant materials, and in its letter request of October 9, 2023, Baker Botts asked the  
7 Special Master to approve the use of the "Su qualifiers" as a modification to Plaintiffs' search  
8 terms. Consistent with and in compliance with the Second Interim Order, BDO, at my direction,  
9 has collected and preserved the additional disputed documents that hit on Plaintiffs' search terms  
10 without "Su qualifiers," and they remain on the China-based Relativity server awaiting the Special  
11 Master's decision.

#### 12 **State Secret Review**

13 26. I understand from Irico as well as independent Chinese legal counsel by whom I  
14 was advised, that Irico and its employees are bound by Chinese legal requirements preventing the  
15 disclosure of Chinese state secrets.<sup>4</sup>

16 27. To ensure that all Chinese regulations regarding state secrets were followed here,  
17 BDO retained the AnJie Broad Law Firm ("AnJie"), a large and reputable Chinese law firm with  
18 whom Baker Botts has worked in the past, to conduct a review of the materials before releasing  
19 materials to the United States to be reviewed for responsiveness to the Orders. *See About AnJie*  
20 *Broad*, AnJie Broad (last accessed Oct. 23, 2023), <https://www.anjielaw.com/more/aboutus.html>.  
21 Counsel from AnJie informed me that Article 9 of the Chinese Law on Guarding State Secrets  
22 precludes the transmission of materials that contain state secrets, including but not limited to  
23 information that that could cause damage to the national security and interests of politics, economy,  
24 national defense or foreign affairs, to other countries or regions without the express permission of  
25 the relevant competent authorities. *See Law on Guarding State Secrets* (promulgated by the

26 <sup>3</sup> Of these approximately 9,400 files, only 22 originated from Mr. Su's former laptop, a likely result  
27 of the reformatting.

28 <sup>4</sup> I have been informed by Irico that documents previously collected and considered in response to  
discovery on the merits did not contain state secrets and that no such materials were withheld on  
state secret grounds.



1 Standing Comm. Nat'l People's Cong., Sept. 5, 1988, rev'd Apr. 29, 2010, effective Oct. 1, 2010),  
 2 art. 9, 2010 P.R.C. Laws 71.75 (China).

3 28. To respect these requirements while facilitating Irico's compliance with the Orders,  
 4 counsel from AnJie reviewed the following sets of documents (i.e., all that had been identified by  
 5 Baker Botts as potentially relevant):

- 6 • all of the individual "go get" documents collected by BDO directly from  
 7 interviewees or Irico departments;
- 8 • all of the documents from Mr. Su's laptop that hit on Plaintiffs' search terms and  
 9 Baker Botts' search terms without applying any "Su qualifiers"; and
- 10 • all of the emails and internal text messages collected for the 15 custodians that hit  
 11 on all of the search terms with "Su qualifiers."

12 This state secret review occurred before the documents were released to Baker Botts to be reviewed  
 13 for responsiveness to the Orders. Thus, to be clear, AnJie did not withhold any documents on the  
 14 basis that the documents were not responsive to the Orders. Their review was limited to evaluating  
 15 the documents for state secret content, except as described in the following paragraph. AnJie did  
 16 not identify any documents from Mr. Su's former laptop or from the direct "go get" materials from  
 17 interviewees or Irico departments as containing state secrets. AnJie determined that 177 email files  
 18 and 818 internal text message files, 995 files in total, could not be provided to Baker Botts for  
 19 further review because of state secret content. Given AnJie's determination, these documents  
 20 could not be released to the US or reviewed by US-based lawyers.

21 29. However, to further evaluate whether, and how many of, these documents were  
 22 responsive to the Orders, I instructed Mr. Carter to train a lawyer from the AnJie firm who is a  
 23 U.S.-barred and licensed attorney regarding the scope of the requirements of the Orders, and to  
 24 provide him a copy of the Orders for his review and understanding. Mr. Carter reviewed the  
 25 Orders with Cui Wei from AnJie, a member of the New York state bar, and Mr. Cui then reviewed  
 26 the set of documents determined to contain state secrets for responsiveness. Based on Mr. Cui's  
 27 review, it was determined that 21 of the 995 files withheld were responsive to the Orders. A log of  
 28

1 the 21 responsive documents withheld under AnJie's determination of state secret content has been  
2 provided to Plaintiffs as part of the production.

3 30. I also understand from Irico as well as independent Chinese legal counsel by whom  
4 I was advised, that Irico is prohibited from disclosing personally identifiable information relating to  
5 individual employees. Such information is protected from disclosure by the China Personal  
6 Information Protection Law (promulgated by the Standing Comm. Nat'l People's Cong., Aug.  
7 20,2021, effective Nov. 1, 2021), art. 11, 2021 P.R.C. Laws 1117.1125 (China). In light of this  
8 requirement, AnJie and BDO also reviewed the following sets of documents to ensure that they did  
9 not contain any personally identifiable information:

- 10 • all of the individual "go get" documents collected by BDO directly from  
11 interviewees or Irico departments;
- 12 • all of the documents from Mr. Su's laptop that hit on Plaintiffs' search terms and the  
13 Baker Botts search terms without applying any "Su qualifiers"; and
- 14 • the emails and internal text messages collected for the 15 custodians that hit on all  
15 of the search terms with "Su qualifiers."

16 No documents responsive to the Orders were withheld on the basis of such personal information.  
17 If such personal information was identified, per my instructions, AnJie or BDO applied solid black  
18 redactions only as to that personal information, which is clearly identified in the documents  
19 produced to the plaintiffs.

20 31. At my direction, BDO transferred all of the documents that it reviewed that did not  
21 contain state secrets, including those documents that contained redactions for personal information,  
22 from the China-based Relativity server to a US-managed Relativity service. Also at my direction,  
23 Mr. Carter trained a team of U.S.-barred attorneys fluent in Mandarin (since the subject documents  
24 were in Chinese) on the requirements of the Orders, and supervised their review of these  
25 documents for responsiveness. An initial production of responsive, non-privileged materials was  
26 made to Plaintiffs on October 13, 2023. This initial production included over 80% of responsive  
27 email files (excluding those that required privilege redactions) as well as over 80% of responsive  
28 files obtained through "go get" collections from interviewees or Irico departments. All remaining

1 responsive, non-privileged materials from the files transferred to the US-based server are being  
2 produced to the Plaintiffs today, October 23, 2023. Documents withheld for privilege have been  
3 identified on a privilege log provided to Plaintiffs.

4 **Submission of Letter to the Special Master under First Interim Order**

5 32. Along with this submission, Baker Botts is producing a letter to the Special Master,  
6 as required by the First Interim Order, providing “the names of Irico personnel involved in  
7 communicating with Mr. Su about: (a) his deposition, resignation and end of employment from  
8 January 2021 to the present and (b) information about his participation and knowledge of  
9 competitor contacts and communications.”

10  
11 I declare under penalty of perjury that the foregoing is true and correct. Executed this 23<sup>rd</sup>  
12 day of October, 2023, in Washington, D.C.

13  
14 /s/ John M. Taladay

15 John M. Taladay (*pro hac vice*)  
16 BAKER BOTTS L.L.P.  
17 700 K Street, N.W.  
18 Washington, D.C. 20001  
19 202.639.7700  
20 202.639.7890 (fax)  
21 Email: John.Taladay@bakerbotts.com

22 *Attorney for Defendants Irico Group Corp.*  
23 *and Irico Display Devices Co., Ltd.*  
24  
25  
26  
27  
28

# EXHIBIT 1

## File Export Report by BDO – Su Xiaohua Laptop

We analyzed the image file using the Encase software and found that the Operating System of the computer was installed on June 15 2022 06:55:14 GMT. More details please see below screenshot picture.

Table		Timeline			
		Selected 0/9			
	Name	File Offset	Last Written	Type	Value Text
<input type="checkbox"/> 1	System Root		08/28/23 01:01:38 PM (+8:00 中国标准...	1	C:\WINDOWS
<input type="checkbox"/> 2	Shutdown Time		08/28/23 12:47:33 PM (+8:00 中国标准...	3	Mon, 28 Aug 2023 04:47:33 GMT
<input type="checkbox"/> 3	Registered Owner		08/28/23 01:01:38 PM (+8:00 中国标准...	1	zdl@ch.com.cn
<input type="checkbox"/> 4	Product Name		08/28/23 01:01:38 PM (+8:00 中国标准...	1	Windows 10 Home China
<input type="checkbox"/> 5	Product ID		08/28/23 01:01:38 PM (+8:00 中国标准...	1	00342-36245-38667-AAOEM
<input type="checkbox"/> 6	Path Name		08/28/23 01:01:38 PM (+8:00 中国标准...	1	C:\WINDOWS
<input type="checkbox"/> 7	Install Date		08/28/23 01:01:38 PM (+8:00 中国标准...	4	Wed, 15 Jun 2022 06:55:14 GMT
<input type="checkbox"/> 8	Current Version		08/28/23 01:01:38 PM (+8:00 中国标准...	1	6.3

File export statistics (Date range is on or before 2022/06/20)

Type	Number of exported files	Size of exported files
Edocs	427	88.9 MB
Emails	11	187.9 KB
Picture Files	24245	360.3 MB
Compressed Files	9	7.3 MB
Deleted Edocs	9	1.3 MB
Deleted Emails	1	131 KB
Deleted Picture Files	3836	83.7 MB
Deleted Compressed Files	17	2.6 MB

# EXHIBIT 2



October 20, 2023

**Certification**

**Welocalize Translations**

**TRANSLATOR'S DECLARATION:**

I, Ann Chen, hereby declare:

That I possess advanced knowledge of the Spanish and English languages. The attached Spanish into English translation has been translated by me and to the best of my knowledge and belief, it is a true and accurate translation of bates number: IRI-SU-000219.

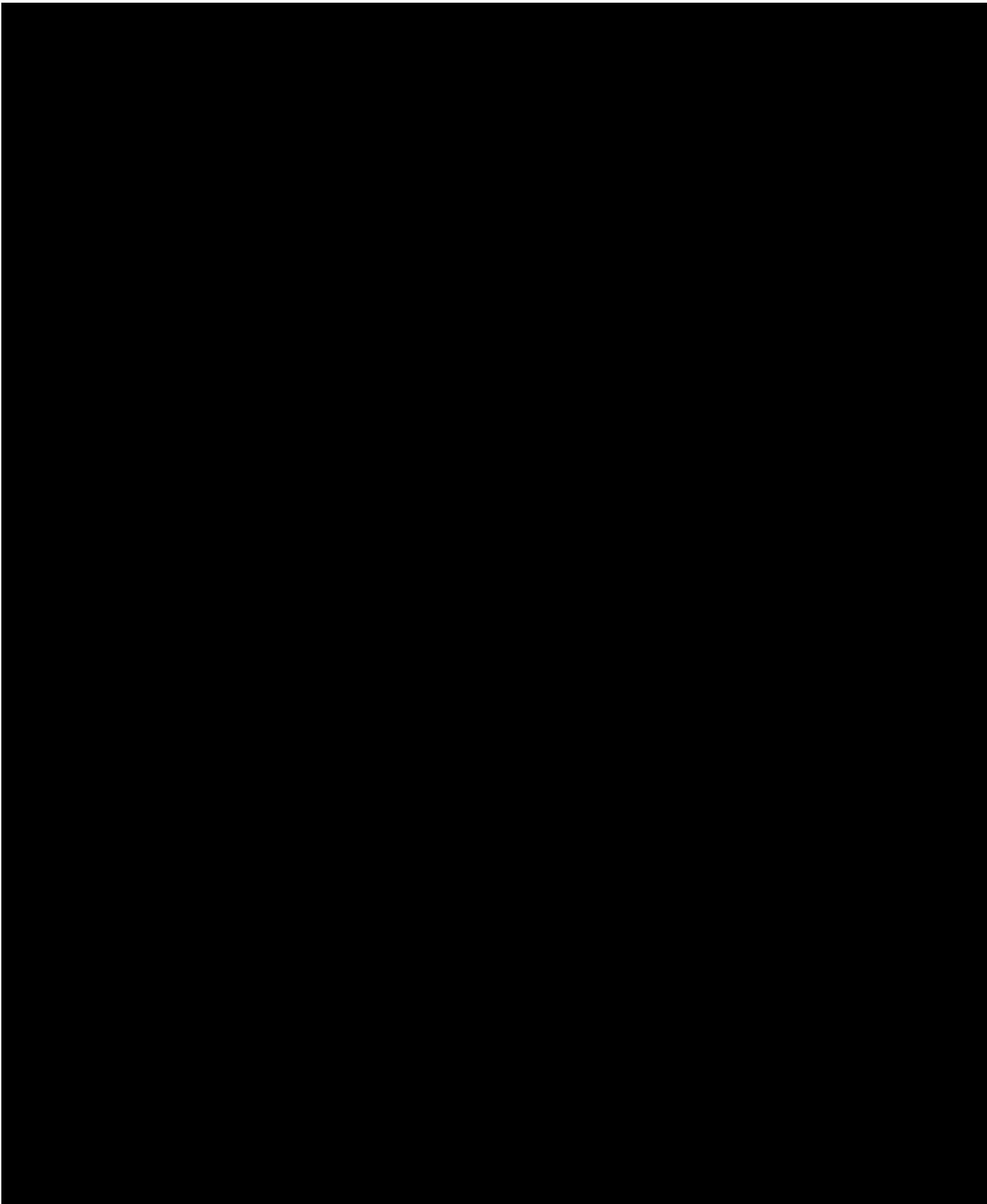
Ann Chen

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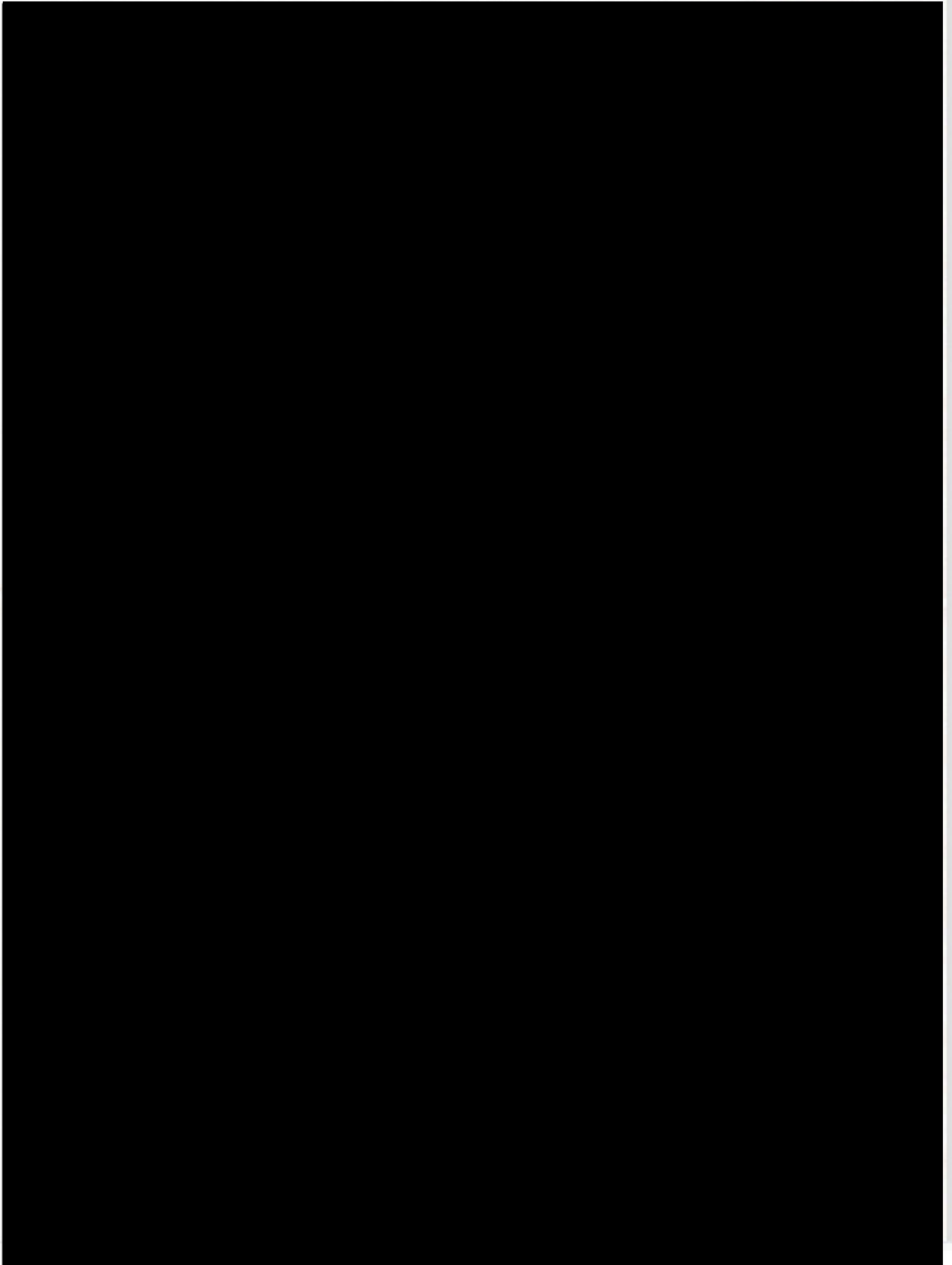
Ann Chen

Project Number: BBLP\_2310\_P0042

15 W. 37th Street 4th Floor  
New York, NY 10018  
212.581.8870







# EXHIBIT 3



October 20, 2023

**Certification**

**Welocalize Translations**

**TRANSLATOR'S DECLARATION:**

I, Ann Chen, hereby declare:

That I possess advanced knowledge of the Spanish and English languages. The attached Spanish into English translation has been translated by me and to the best of my knowledge and belief, it is a true and accurate translation of bates number: IRI-SU-000202.

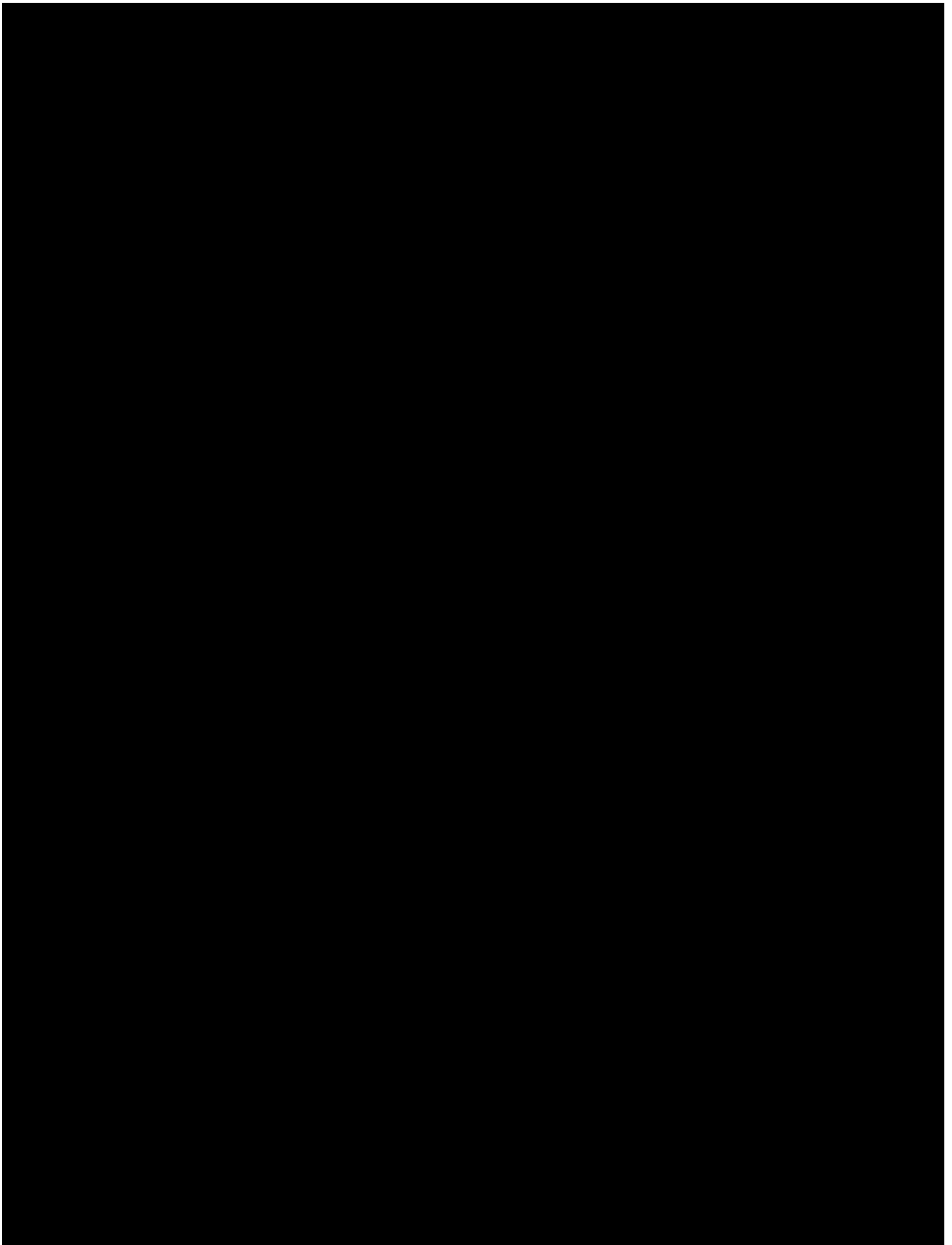
Ann Chen

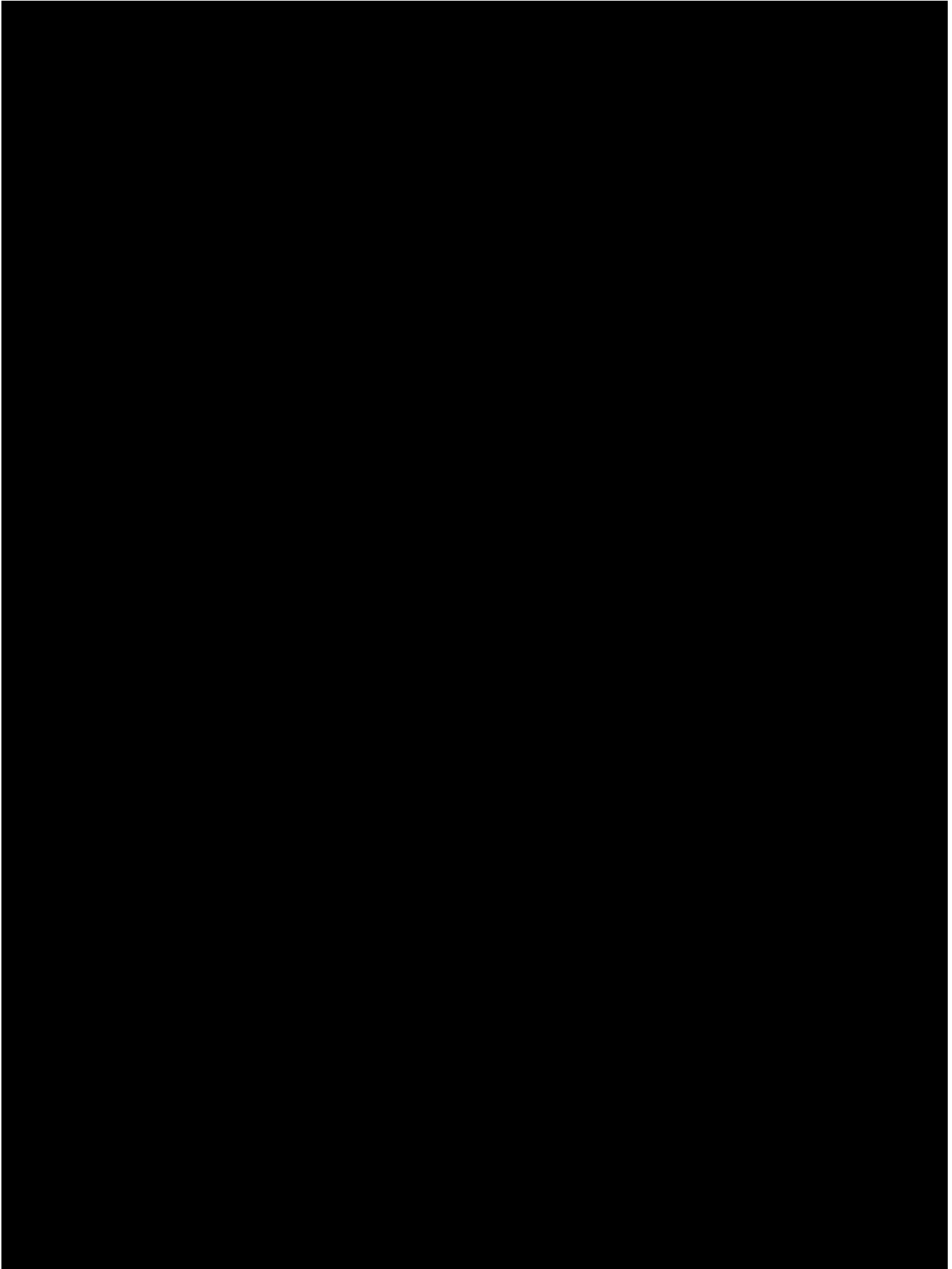
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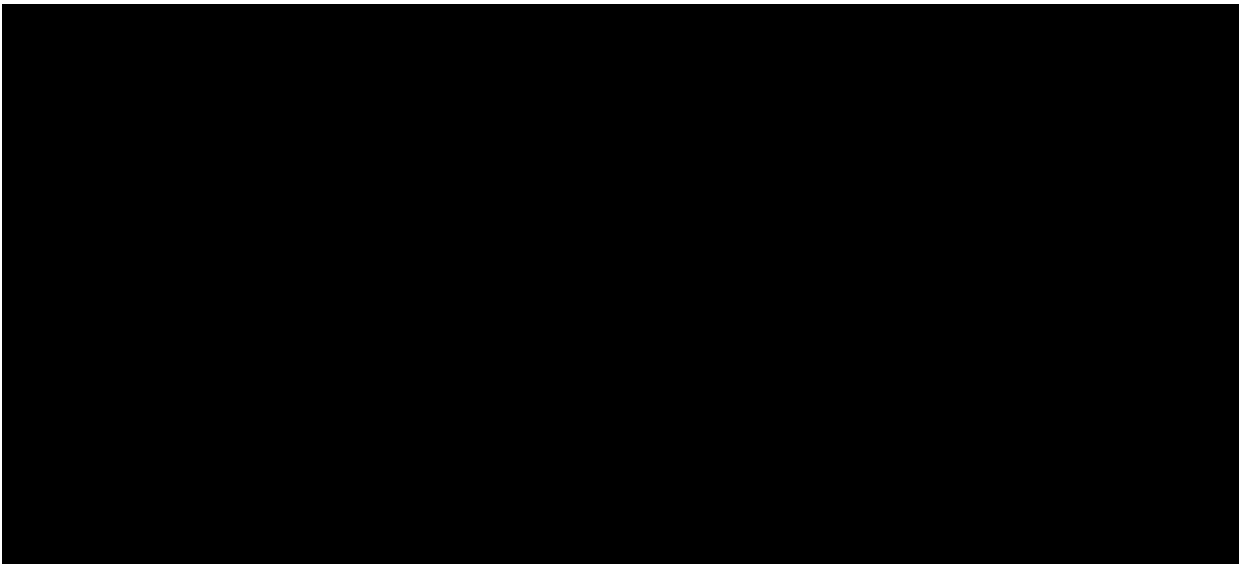
Ann Chen

Project Number: BBLP\_2310\_P0042

15 W. 37th Street 4th Floor  
New York, NY 10018  
212.581.8870









# EXHIBIT 4





October 20, 2023

**Certification**

**Welocalize Translations**

**TRANSLATOR'S DECLARATION:**

I, Ann Chen, hereby declare:

That I possess advanced knowledge of the Spanish and English languages. The attached Spanish into English translation has been translated by me and to the best of my knowledge and belief, it is a true and accurate translation of bates number: IRI-SU-000229.

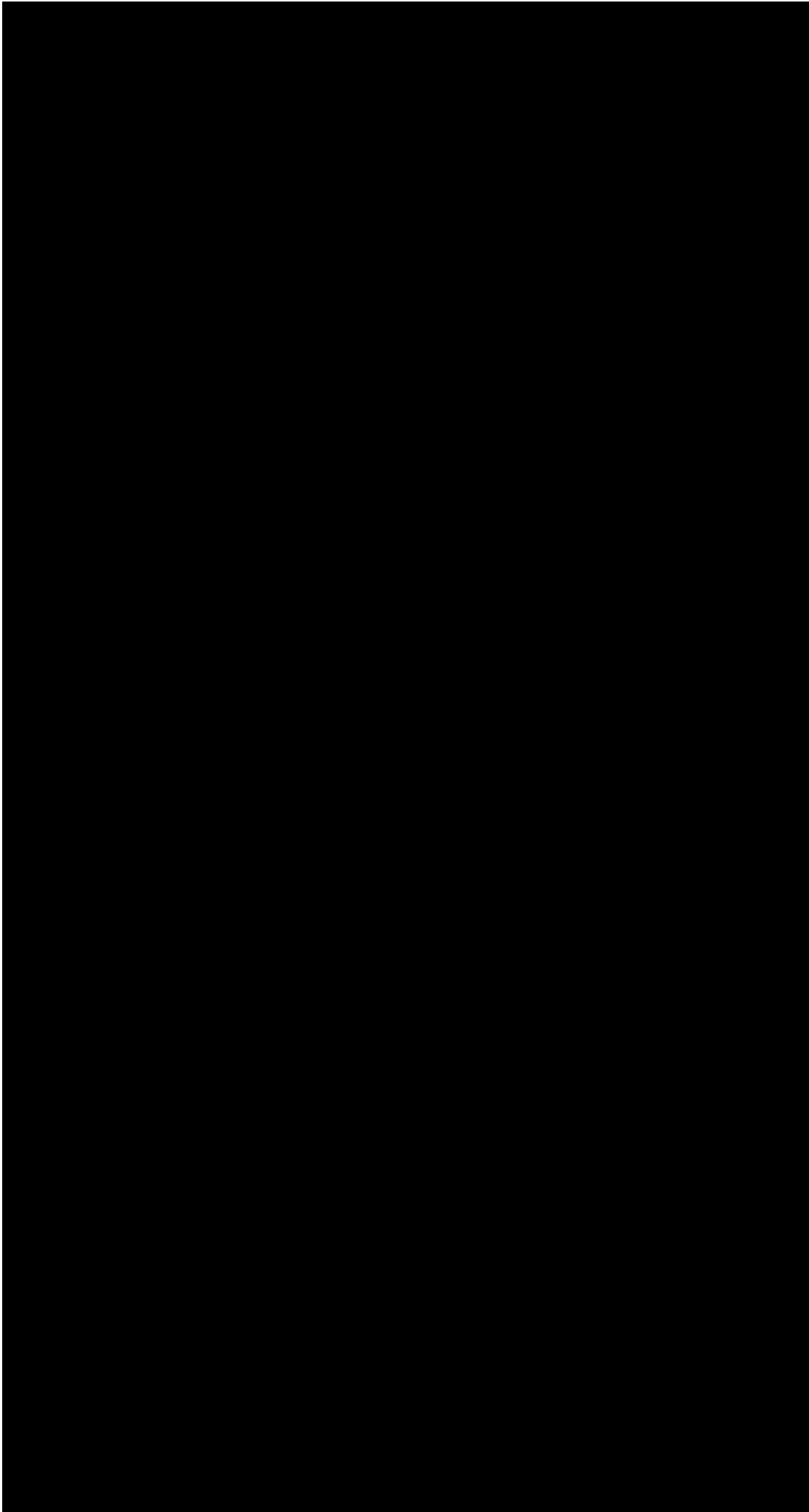
Ann Chen

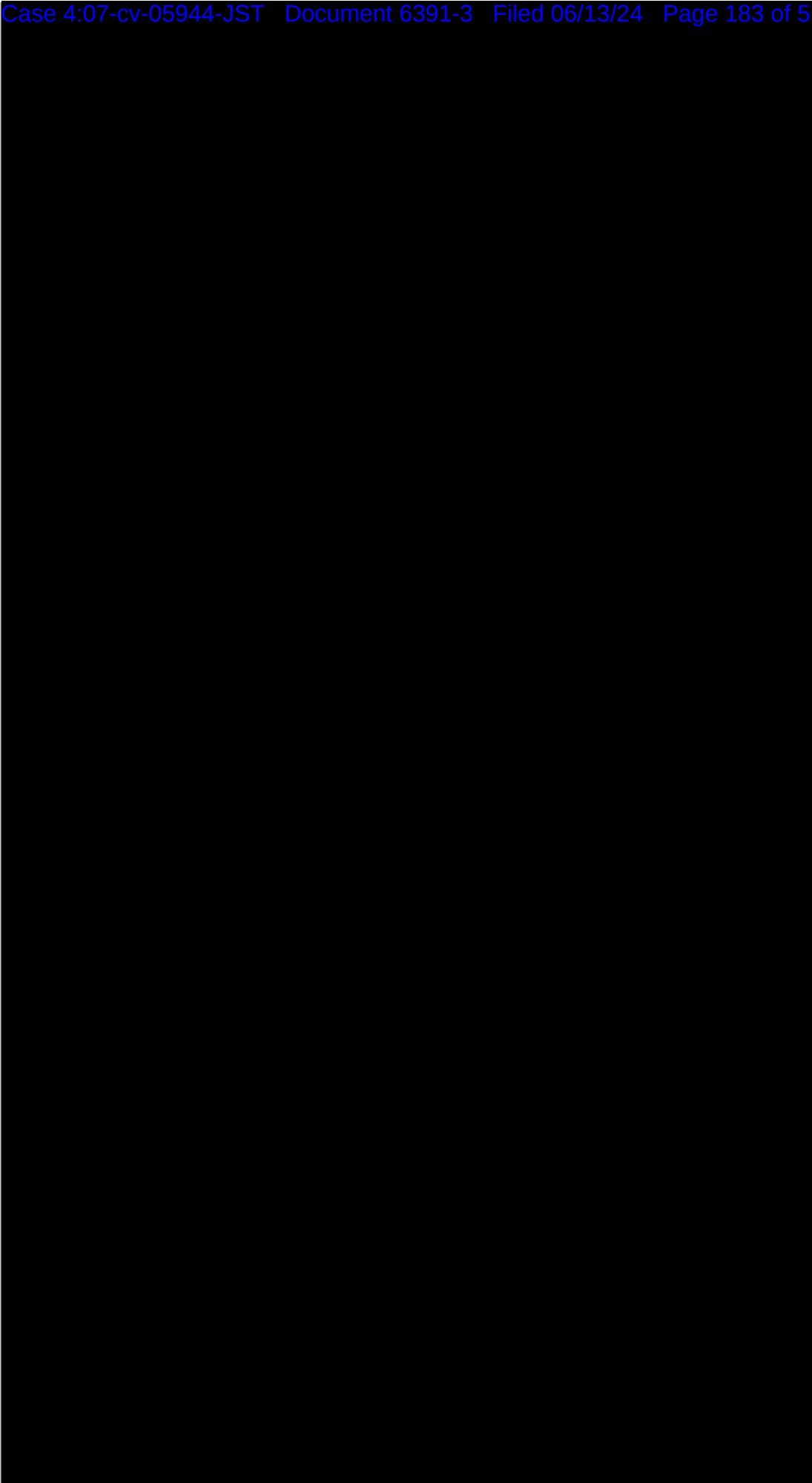
---

Ann Chen

Project Number: BBLP\_2310\_P0042

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New York, NY 10018  
212.581.8870





# EXHIBIT 5

**BAKER BOTTS** LLP

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**WASHINGTON**

October 9, 2023

VIA E-MAIL [VRW@JUDGEWALKER.COM]

John Taladay  
TEL: 2026397909  
FAX: 2026391165  
john.taladay@bakerbotts.com

The Honorable Vaughn R. Walker  
Law Office of Vaughn R. Walker  
Four Embarcadero Center, Suite 2200  
San Francisco, CA 94111

Re: In re Cathode Ray Tube (CRT) Antitrust Litigation, MDL No. 1917, Master File  
No. 07-CV-944-JST

Dear Judge Walker:

Defendants Irico Group Corp. and Irico Display Devices Co., Ltd. (collectively, “Irico”) write with respect to Your Honor’s Interim Reports and Recommendations on Plaintiffs’ Motion for Discovery Sanctions dated August 4, 2023 (ECF No. 6233) (“First Interim Order”), and September 1, 2023 (ECF No. 6275) (“Second Interim Order”) (collectively, “Orders”). This letter discusses three topics: (1) we provide an update regarding Irico’s compliance with the Orders; (2) we ask that Your Honor approve a modified version of Plaintiffs’ search terms to identify responsive documents, which Plaintiffs oppose; and (3) we request a short further extension to October 23, 2023, for the completion of Irico’s response to the Orders, which Irico will begin providing to Plaintiffs by the current deadline of October 13th.<sup>1</sup>

### **1. Update on Compliance Efforts to Date**

Irico and Baker Botts have undertaken extraordinary efforts to comply with Your Honor’s Orders and continue to work as expeditiously as possible on all fronts. As the Court is aware, Irico had already been working to comply with the Your Honor’s First Interim Order throughout the month of August through the efforts of Norton Rose Fulbright and with oversight by Baker Botts. After Your Honor’s Second Interim Order, Baker Botts needed to restart certain aspects of the investigation and processes to comply with new requirements that specified which entities were

---

<sup>1</sup> As discussed in greater detail below, should Your Honor determine that Irico must review all of the Chinese-language documents that hit on Plaintiffs’ overbroad search terms, Irico would need at least an additional 40 days from the current deadline to review and produce any responsive documents from that set. Irico would still plan to produce responsive materials from its proposed search terms by October 23.

**BAKER BOTTS** LLP

The Honorable Vaughn R. Walker

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required to undertake specific requirements of Your Honor's Orders. As required, I have personally directed and supervised the efforts and processes described below.

Since the Second Interim Order, Irico and Baker Botts have completed the following tasks in accordance with U.S. discovery standards:<sup>2</sup>

- A Baker Botts attorney of record traveled to China along with a bilingual U.S.-based forensic collection specialist from BDO, a U.S. discovery vendor, to personally implement the investigative steps described below under my direction;
- The same Baker Botts attorney took physical custody of Mr. Su's former laptop and personally oversaw BDO's imaging of the laptop's complete content and forensic analysis of all recovered files;
- Baker Botts, through an interpreter, conducted interviews of 23 current or former employees of Irico Group and its subsidiaries regarding relevant issues, including their knowledge of Mr. Su's deposition, Mr. Su's departure from Irico, Mr. Su's current employment, any ongoing relationship between Irico and Mr. Su, communications with Mr. Su, information regarding other individuals who may have relevant knowledge, and potential locations of responsive documents;
- Baker Botts identified 15 custodians potentially in possession of relevant documents and undertook forensic collection of email and internal text messaging. *See Attachment A* for a list of the selected custodians;
- BDO, under the direction of Baker Botts, collected all emails and internal text messages from the messaging system (including attachments) for all 15 custodians directly from the back-end server used by Irico, for all relevant time periods without any additional limitation.<sup>3</sup> This resulted in over 72,000 documents being collected from the relevant custodians;
- Baker Botts, with assistance from BDO, collected certain other responsive materials based on the interviews described above, including HR files, official

---

<sup>2</sup> The list below is intended to provide Your Honor a high-level overview of the steps taken to comply with the Orders. Further details on the processes implemented will be provided in a declaration when the process is complete as required by the Orders.

<sup>3</sup> The relevant time periods used for collection were January 1, 2021, through September 1, 2023 (or the last day of employment with any Irico company), for any custodians with any knowledge or involvement regarding Mr. Su's requested deposition, and January 1, 2022, through September 1, 2023 (or the last day of employment with any Irico company), for all other custodians.

**BAKER BOTTS** LLP

The Honorable Vaughn R. Walker

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personnel announcements, and personal WeChat communications from personal devices to the extent the individual permitted such collection;

- Baker Botts utilized the complete list of search terms offered by Plaintiffs on September 7<sup>th</sup> and also developed additional search terms based on information learned from the interviews and the targeted document collections described above to identify potentially responsive documents. BDO then applied Plaintiffs' proposed search terms to all collected emails, internal enterprise messaging and shared files, and files recovered from Mr. Su's laptop, resulting in over 40,000 documents with direct hits, making up over 55 percent of all files collected from custodians.<sup>4</sup> As discussed below in Part 2 of this letter, Baker Botts then applied a set of "Su qualifiers" to the Plaintiffs' proposed search terms and added additional relevant search terms based on our investigation, resulting in a subset of 3,300 documents with direct hits for further review and processing;<sup>5</sup>
- These potentially responsive materials were then screened for state secrets as required by Chinese law. The state secret review was conducted by the AnJie law firm, one of China's largest and most highly regarded law firms, working with BDO under Baker Botts' direction, not under the direction of Irico. A small number of documents were withheld for state secret purposes and were handled as discussed below. All documents not deemed to contain states secrets were exported to a U.S.-based server for review by and under the supervision of Baker Botts attorneys;
- The three-week extension previously approved by the Special Master included one week from September 29 through October 6 that comprised the Chinese Golden Week holiday, a major annual holiday in China. In seeking the previous three-week extension, Baker Botts had planned that all of the steps described above would have been completed and the materials would all be loaded to the U.S.-based server for review before the start of the Chinese Golden Week holiday. Because of both logistical and technical challenges, and despite the efforts of Irico and its vendors during the holiday period, we were not able to accomplish all of those steps prior to the Golden Week holiday. However, as of yesterday, this process is now complete for the search terms described above, i.e., those documents that hit on a search term subject to the "Su qualifiers" described below. Baker Botts is now in

---

<sup>4</sup> To account for family members and potentially related internal messages and attachments, approximately 55,000 files in total were identified as either direct search hits on Plaintiffs' proposed terms or potentially related to those direct hits.

<sup>5</sup> Accounting for family members and potentially related internal messages and attachments, a total of approximately 9,400 files were identified and segregated for further review under the proposed terms with "Su qualifiers."

**BAKER BOTTS** LLP

The Honorable Vaughn R. Walker

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the process of conducting and directing the review of these materials for responsiveness and privilege;

- During this process, Baker Botts met and conferred twice with Plaintiffs regarding their proposed search terms and the need for reasonable limitations given the extremely high hit rate, and to discuss Baker Botts' proposed terms that incorporate such reasonable limitations, but Plaintiffs were not willing to discuss any specific limitations to their search terms, including applying the "Su qualifiers" to their search terms; and
- Finally, because state secret review was required before the documents could be transferred to the U.S. for responsiveness review, we had not yet determined whether any of the documents withheld for state secret purposes were responsive to the requirements of the Order. To address this issue, a bilingual U.S.-barred lawyer from the AnJie law firm, who was trained by Baker Botts regarding the scope of the Orders and worked under Baker Botts' direction, is conducting a relevance review of the documents withheld for state secret content.

## **2. Dispute Regarding Search Terms**

One of the most impactful changes in the Second Interim Order was that the Plaintiffs could provide search terms to be applied against the collected electronically stored information. As Your Honor is already aware, Plaintiffs took full advantage of Your Honor's offer and provided a list of around 80 terms without any qualifiers or limitations. *See* Attachment B. Most strikingly, Plaintiffs suggested search terms to be applied to the documents of all custodians without any requirement that any of these search terms relate to Mr. Su. As discussed below, this results in a gross over-identification of potentially responsive materials and would require an excessive degree of time and effort to review without the prospect of any meaningful uptick in responsive documents. Plaintiffs have declined to modify any the search terms to allow for some relevance to Mr. Su. Herein, Irico is proposing to apply all of Plaintiffs' search terms modified only by certain "Su qualifiers."

As detailed above, Baker Botts identified 15 custodians with ESI potentially responsive to the Orders. These custodians ranged from the most senior leadership at the company, to those in Human Resources who touched briefly on limited issues related to Mr. Su. Most of these individuals had only limited interactions, if any, with Mr. Su. Nonetheless, because our collection was comprehensive as to their electronic files on the company's servers, over 72,000 documents were collected during this process.

Despite most of these custodians having little to do with Mr. Su, over 40,000 of the documents hit on one of Plaintiffs' search terms. *See* Attachment C for Plaintiff search term hits on email files and Attachment D for Plaintiff search term hits on internal text messages. This was inevitable given that Plaintiffs made no effort to limit search terms to identify documents



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The Honorable Vaughn R. Walker

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specifically relevant to Mr. Su. For example, one of Plaintiffs search terms was “leadership.” Plaintiffs seek to require Irico to identify and review every single document that used the word “leadership” regardless of whether it had any relevance to Mr. Su or whether Mr. Su was even mentioned in the document.<sup>6</sup> Over 14,000 documents (approximately 20 percent of the collected documents) hit on this term alone when combining the hits in for emails and internal text messages. Similarly, Plaintiffs’ search terms include numerous terms related to personnel and human resource functions but again make no effort to identify those documents specifically related to Mr. Su. Given that three of the custodians actually work in the human resources area, it is no surprise that almost 4,000 documents hit on the term “Human Resources Department.” Again, applying Plaintiffs’ unmodified search terms would require that we review all such documents for relevance, irrespective of whether they conceivably have anything to do with Mr. Su.

Baker Botts had already intended to use many of the same general terms that Plaintiffs suggested, as well as additional relevant terms that it intended to apply with appropriate qualifiers, consistent with U.S. discovery practice, to identify when those terms were used in reference to or related to Mr. Su. These “Su qualifiers” simply require that any document hitting on Plaintiffs’ search terms also include a term relating to Mr. Su either by his name (in various forms identified by Plaintiffs), his employee ID number, his citizen ID number or his email address. Specifically, the “Su qualifiers” include:

- “苏晓华,” Mr. Su’s full name in Chinese;
- “苏总,” an abbreviation for “General Manager Su,” sometimes used to refer to Mr. Su by his former colleagues;
- Xiaohua, Mr. Su’s given name in English;
- Mr. Su’s 18-digit Chinese citizen ID number;
- 100751, Mr. Su’s Irico employee ID number;
- sxh@ch.com.cn, Mr. Su’s email address; and
- sxh, the prefix for Mr. Su’s email address.

For example, Irico still ran the term for “leadership” but also required that term to appear somewhere in the same document as one of the Su qualifiers. This appropriate focus on Mr. Su reduced the number of hits on the term “leadership” from approximately 14,000 to approximately 1,000, which captures all instances where Mr. Su was mentioned or referenced in the same document as the term “leadership.” Applying these Su qualifiers to all of the search terms suggested by Plaintiffs reduced the total number of hits to be reviewed from over 40,000 to approximately 3,300 (not including attachments), a number much more in line with what would be expected given the narrow scope of the issues at hand and the broad responsibilities of most of

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<sup>6</sup> Note that all of these documents are in Chinese, which increases the time and burden in reviewing materials and identifying responsive materials.

**BAKER BOTTS** LLP

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the custodians.<sup>7</sup> See Attachment E for search term hits with “Su qualifiers” on email files and Attachment F for search term hits with “Su qualifiers” on internal text messages.<sup>8</sup>

Baker Botts presented these results to Plaintiffs in the hopes of limiting the searches to more reasonable terms, but Plaintiffs surprisingly refused to engage in any substantive discussion on specific search terms. Previously, when Irico raised concerns with Your Honor about the scope of the search terms, Plaintiffs assured Your Honor (and Irico) that: “To the extent Irico communicates any legitimate concerns about any of these terms, Plaintiffs will address them immediately ....” Plaintiffs’ Letter Response to Request for Extension, at 2 (Sept. 14, 2023). Instead, Plaintiffs took the view that Baker Botts was required to produce all responsive documents under Your Honor’s Orders and “Plaintiffs cannot modify this requirement.” See Attachment G. That suggestion is wrong on at least two fronts. First, it is diametrically opposed to the representation that Plaintiffs made to Your Honor that it could and would work with Baker Botts to address plainly legitimate issues with their search terms. Second, it undermines the Special Master’s reasonable instruction, consistent with U.S. discovery practice, that search terms be used here as a way of identifying potentially relevant documents (rather than effectively demanding that Irico review every single communication from 15 employees over a span of years for targeted information relating to Mr. Su, which would be both unreasonable and unworkable).

So now Irico must ask for the Special Master’s assistance in resolving this dispute. The Second Interim Order states: “If Irico’s counsel deems any search terms improper, they can bring that matter to the undersigned’s attention and withhold production of selected documents until the objection is resolved. But collection of responsive documents precedes objections.” ECF No. 6324 at 5. Irico and Baker Botts are following Your Honor’s guidance exactly. We have collected all of the relevant materials and provided search term hit results to the Plaintiffs and Your Honor, but we request reasonable modification to the Plaintiffs’ search terms. As detailed above, we believe that adding the “Su qualifiers” described above to the search terms is appropriate and in accordance with U.S. discovery best practice, whereas Plaintiffs’ unbounded search terms are not. Without awaiting the Special Master’s decision on this dispute, we are moving forward on the review and production of documents that hit on the search terms applying the “Su qualifiers” and will be producing responsive materials as soon as possible.

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<sup>7</sup> In our unsuccessful meet and confer conversations with Plaintiffs, they appeared to suggest that Baker Botts should focus on reviewing all or some set of the documents that that did not hit on any terms with “Su qualifiers” to confirm that none of the documents contain responsive information. Focusing our efforts on the documents *least* likely to contain responsive material, however, is backwards, and Plaintiffs know that this is impractical given the sheer volume of the documents that hit on their unqualified search terms as well as the restrictions in China on releasing documents until they have been reviewed for state secrets.

<sup>8</sup> Minor modifications have been made to these charts since they were provided to Plaintiffs to account for typographical errors and search corrections, neither of which impacted the search results in any meaningful way.

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### 3. Request for Extension of Ten Days

The identification, collection and processing of the responsive documents and the collection of relevant information has been a laborious process as detailed above. We note again that the process requiring Baker Botts (and my own) direct involvement had to be restarted after the September 1<sup>st</sup> Order. Irico, Baker Botts and its vendors have faced many technical, logistical, and geographic hurdles, but we can assure the Special Master that extraordinary efforts have been undertaken and we have made substantial progress in the five weeks since its issuance. However, because the potentially responsive materials from China were not able to be uploaded to the U.S. for completion of review until after the Chinese Golden Week holiday, which just concluded, we will not be able to fulfill all requirements of the Orders by the current deadline of October 13<sup>th</sup>.<sup>9</sup>

We intend to produce materials to Plaintiffs on a rolling basis beginning with an initial production of responsive materials by the current deadline of October 13<sup>th</sup>. We believe we will need an additional 10 days (until October 23<sup>rd</sup>) to complete the review and production of the responsive materials and complete the other requirements of the Order, provided the Special Master approves the use of the Su qualifiers as discussed above. Should Your Honor require the application of all of Plaintiffs' suggested search terms without the Su qualifiers, however, the volume of documents to be processed, reviewed for state secret content, and reviewed for responsiveness would increase by well over five-fold. In that case, we estimate that Baker Botts would require an extension of at least 40 additional days from the current deadline to comply.

Thank you for your consideration of these issues.

Sincerely,  
*/s/ John Taladay*  
John Taladay

cc: Tanveer Singh (tanveer.singh@fedarb.com)  
R. Alexander Saveri (rick@saveri.com)  
Geoffrey C. Rushing (geoff@saveri.com)

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<sup>9</sup> As part of our meet and confer process, we asked for Plaintiffs' position on a one-week extension of the current deadline. Since the time of these discussions, there was a further, short delay in the transmission of the materials from China at the end of the Chinese Golden Week holiday so we now believe a ten-day extension will be necessary. Plaintiffs took no affirmative position on our request, but instead stated that the request "is more appropriately directed to Judge Walker." See Attachment G.

**BAKER BOTTS** LLP

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Matthew D. Heaphy (mheaphy@saveri.com)

Mario N. Alioto (malioto@tatp.com)

Lauren C. Capurro (lauren russell@tatp.com)

Daniel E. Birkhaeuser (dbirkhaeuser@bramsonplutzik.com)

# Attachment A

*Irigo Custodian List - Oct. 6, 2023*

<b>Custodian Name</b>	<b>Position</b>
Bao Yong	Secretary of Commission for Discipline Inspection of CCP Committee of Irigo Group
Bing Zhang	Executive Director of Xianyang Irigo Group Industrial Co., Ltd.
Gao Qian	General Business Supervisor and Confidential Officer of the Group Office of Irigo Group
Guo Quan	Director of Group Office of Irigo Group
Hao Li	Director of Company Office of Xianyang Irigo Group Industrial Co, Ltd.
Mai Ya	HR Employee of Irigo Group
Shi Feng	HR Director of Irigo Group
Si Yuncong	(former) Chairman of Irigo Group
Su Xiaohua	Focus of investigation
Wang Jijun	Chief Financial Officer, Irigo (Foshan) Flat Panel Display Co., Ltd. and positions in other companies.
Xu Jinmei	Admin & HR Director of Irigo (Foshan) Panel Display Co., Ltd.
Yang Yuanjiang	(former) General Manager of Irigo Group
Zhang Dongling	Operation and Management Director of Irigo (Foshan) Panel Display Co., Ltd.
Zhang Jiming	General Manager of Irigo (Foshan) Panel Display Co., Ltd. and positions in other entities
Zhang Wenkai	Deputy General Counsel of Irigo Group

# Attachment B

**Carter, Tom**

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**From:** Matthew Heaphy <mheaphy@saveri.com>  
**Sent:** Thursday, September 7, 2023 2:57 PM  
**To:** Taladay, John; Werbel, Evan; Carter, Tom; Lucarelli, Drew; kaylee.yang@nortonrosefulbright.com; Geraldine W. Young  
**Cc:** vrw@judgewalker.com; Tanveer Singh; Rick Saveri; Geoff Rushing; David Hwu; Mario Alioto; Lauren Capurro; Dan Birkhaeuser; Alan Plutzik  
**Subject:** In re Cathode Ray Tube (CRT) Antitrust Litigation – MDL No. 1917, Master File No. 07-CV-5944-JST  
**Attachments:** Plaintiffs Su Search Terms.xlsx

[EXTERNAL EMAIL]

Counsel:

On behalf of DPPs and IPPs, attached please find Plaintiffs' search terms provided pursuant to the Special Master's Second Interim Report & Recommendation on Plaintiffs' Motion for Discovery Sanctions, dated September 1, 2023 (ECF No. 6275) (the "Order").

Plaintiffs request that Baker Botts provide a list of all additional search terms it intends to use in its compliance with the Order.

Thank you.

Matthew Heaphy  
Saveri & Saveri, Inc.  
706 Sansome Street  
San Francisco, CA 94111  
mheaphy@saveri.com  
Telephone: (415) 217-6810  
Facsimile: (415) 217-6813



Search Term	Comment	Source
邀请函	Invitation Letter	IRI-SU-000045 CONFIDENTIAL
加州	California	IRI-SU-000045 CONFIDENTIAL
联邦法院	Federal Court	IRI-SU-000045 CONFIDENTIAL
王昭杰	Wang Zhaojie	IRI-SU-000045 CONFIDENTIAL
苏晓华	Su Xiaohua	IRI-SU-000045 CONFIDENTIAL
Xiaohua		IRI-SU-000133 CONFIDENTIAL
闫云龙	Yan Yunlong	IRI-SU-000045 CONFIDENTIAL
张文凯	Zhang Wenkai	IRI-SU-000045 CONFIDENTIAL
马丁	Ma Ding	IRI-SU-000045 CONFIDENTIAL
"[REDACTED]"	Su Xiaohua's ID number	IRI-SU-000045 CONFIDENTIAL
"100751"	Su Xiaohua's Employee number	IRI-CRT-00031561
证人	Witness	IRI-SU-000045 CONFIDENTIAL
作证	Testify	IRI-SU-000045 CONFIDENTIAL
澳门	Macau	IRI-SU-000045 CONFIDENTIAL
<a href="mailto:sxh@ch.com.cn">sxh@ch.com.cn</a>	Su's work email	IRI-SU-000052 CONFIDENTIAL
zhangwenkai0713	Zhang's email ID	IRI-SU-000052 CONFIDENTIAL
[All emails, email handles, and IDs used in WeChat and other communication platforms of the individuals named in this list]		
承诺书	<b>Declaration</b> of personnel traveling abroad	IRI-SU-000052 CONFIDENTIAL
苏总	GM Su	IRI-SU-000052 CONFIDENTIAL
CRT		IRI-SU-000129 CONFIDENTIAL
反垄断	Antitrust	IRI-SU-000129 CONFIDENTIAL
诉讼	Litigation	IRI-SU-000129 CONFIDENTIAL
取证	deposition	IRI-SU-000129 CONFIDENTIAL
通行证	Travel permit	IRI-SU-000129 CONFIDENTIAL
签注	Visa	IRI-SU-000129 CONFIDENTIAL
赴港澳	to Hong Kong and Macau	IRI-SU-000103 CONFIDENTIAL
百尺竿头	[Zhang Wenkai's WeChat alias]	IRI-SU-000103 CONFIDENTIAL
尚婷婷	Shang Ting Ting	IRI-SU-000129 CONFIDENTIAL
香港	Hong Kong	IRI-SU-000129 CONFIDENTIAL
高倩	Gao Qian	IRI-SU-000130 CONFIDENTIAL
郭泉	Guo Quan	IRI-SU-000130 CONFIDENTIAL
焦润刚	Jiao Rungang	IRI-SU-000130 CONFIDENTIAL
白建刚	Bai Jiangang	IRI-SU-000130 CONFIDENTIAL
总经理	General Manager	IRI-SU-000130 CONFIDENTIAL
董事长	Chairman	IRI-SU-000130 CONFIDENTIAL
司总	Chairman Si	IRI-SU-000131 CONFIDENTIAL
美国法院	American Courts	IRI-SU-000131 CONFIDENTIAL
证据	Evidence	IRI-SU-000131 CONFIDENTIAL
法律事务	Legal Affairs	IRI-SU-000131 CONFIDENTIAL
领导	Leadership	IRI-SU-000132 CONFIDENTIAL
法务	Legal Affairs	IRI-SU-000132 CONFIDENTIAL
司云聪	Si Yuncong	IRI-SU-000137 CONFIDENTIAL
阳元江	Yang Yuanjiang	IRI-SU-000137 CONFIDENTIAL
包勇	Bao Yong	IRI-SU-000137 CONFIDENTIAL
石峰	Shi Feng	IRI-SU-000137 CONFIDENTIAL
人力资源部	Human Resources Department	IRI-SU-000137 CONFIDENTIAL
专题会	Special Topic Meeting	IRI-SU-000137 CONFIDENTIAL
离岗	Depart from Post	IRI-SU-000137 CONFIDENTIAL
提前	ahead of time	IRI-SU-000137 CONFIDENTIAL
实业	IRICO Group <b>Industrial</b> Ltd.	IRI-SU-000137 CONFIDENTIAL

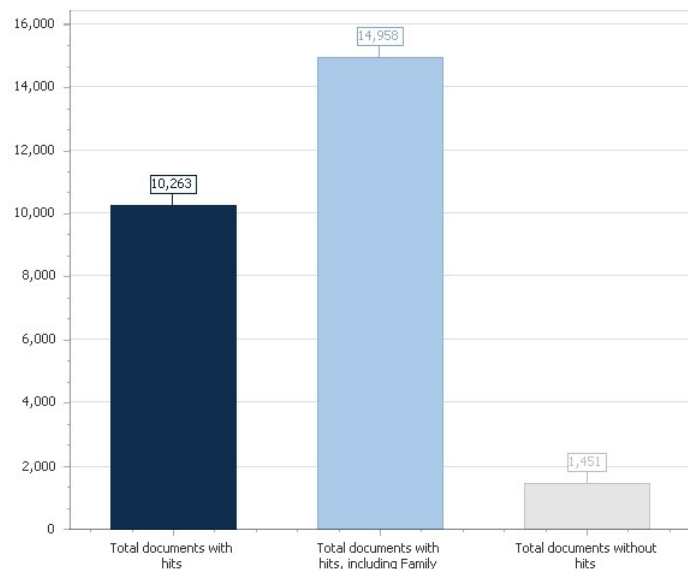
华南	Southern China	IRI-SU-000137 CONFIDENTIAL
绩效考评办法	Irico Group Ltd. <b>Method for Managing and Evaluating Performance</b> of Managers	IRI-SU-000137 CONFIDENTIAL
辞职	Quit	IRI-SU-000141 CONFIDENTIAL
申请	Application	IRI-SU-000141 CONFIDENTIAL
拖	Delay	
延	Postpone	
缓	Postpone	
慢	Slow (to slow)	
借口	Excuse	
藉口	Excuse	
彩管	CRT	
配合	Cooperate	
退休	Retire	
返聘	Rehire	
调岗	Transfer jobs	
顾问	Consultant	
劳务	Labor Contract	
离职	Depart from Post	
解除	Dissolve	
劳动关系	Relationship of Employment	
保险	Insurance	
年金	Pension	IRI-CRT-00007138
个人账户	Personal Account (Pension)	IRI-CRT-00007138
奖励	Reward	IRI-CRT-00007138
养老	Retirement	IRI-CRT-00007148
薪金	Salary	
补贴	Allowance	
绩效	Performance	
奖金	Bonus	

# Attachment C



## Irico Search Terms Report

**Report Name:** 100923 Plaintiffs' Terms Email Server Data for All Custodian  
**Searchable Set:** 0237 Keyword Search Scope of Email Server on All



### Results Summary

Documents in searchable set	Total documents with hits	Total documents with hits, including Family	Total documents without hits
16409	10263	14958	1451

### Terms Summary

Term	Documents with hits	Documents with hits, including Family	Unique hits	Translation/Note
"100751"	3	60	0	Su Xiaohua's employee number
"[REDACTED]"	17	45	0	Su Xiaohua's ID number
bai	36	244	1	Bai Jiangang's email ID
baoyong	241	261	184	Bao Yong's email ID
CRT	1,263	2,547	357	
gqian	678	2,040	380	Gao Qian's email ID
gquan	779	1,262	587	Guo Quan's email ID
jiaorg	3	9	0	Jiao Rungang's email ID
mad	125	479	1	Ma Ding's email ID
mail(sxh@ch.com.cn)	833	1,273	0	Su Xiaohua's work email
shangtt123	10	32	0	Shang Tingting's email ID
shf	152	326	57	Shi Feng's email ID
sxh	833	1,273	0	Su Xiaohua's email ID
wzj-xs	20	76	0	Wang Zhaojie's email ID
Xiaohua	190	756	1	
yanyunlong	1,120	2,771	1	Yan Yunlong's email ID
zhangwenkai0713	2,660	8,842	346	Zhang's email ID
专题会	52	396	0	Special Topic Meeting
个人账户	65	217	19	Personal Account (Pension)
人力资源部	295	1,702	14	Human Resources Department
作证	550	1,260	0	testify
保险	440	2,644	11	Insurance
借口	2	4	0	Excuse
养老	364	1,697	0	Retirement
加州	45	128	0	California
劳务	453	2,026	76	Labor Contract
劳动关系	455	1,117	0	Relationship of Employment

Term	Documents with hits	Documents with hits, including Family	Unique hits	Translation/Note
包勇	57	81	0	Bao Yong
华南	56	234	2	Southern China
反垄断	551	1,537	0	Antitrust
取证	105	390	3	deposition
司云聪	671	2,881	114	Si Yuncong
司总	737	3,416	50	Chairman Si
奖励	233	948	15	Reward
奖金	358	1,005	2	Bonus
实业	771	3,324	79	Industry
尚婷婷	12	37	0	Shang Ting Ting
年金	45	331	0	Pension
延	1,706	6,069	148	Postpone
张文凯	1,999	6,119	0	Zhang Wenkai
彩管	396	2,651	20	CRT
总经理	1,256	4,415	75	General Manager
慢	75	566	0	Slow (to slow)
承诺书	108	365	5	Declaration of personnel traveling abroad
拖	270	1,840	73	Delay
提前	466	3,126	20	ahead of time
法务	141	1,370	3	Legal Affairs
法律事务	894	3,143	3	Legal Affairs
澳门	227	755	0	Macau
焦润刚	12	35	0	Jiao Rungang
王昭杰	244	926	0	Wang Zhaojie
申请	1,470	5,668	237	Application
白建刚	31	204	0	Bai Jiangang
百尺竿头	3	9	0	Zhang Wenkai's WeChat alias
石峰	133	385	1	Shi Feng
离岗	73	268	1	Depart from Post
离职	680	1,895	5	Depart from Post
签证	19	86	0	Visa
绩效	440	913	19	Performance
绩效考评办法	41	49	0	Method for Managing and Evaluating Performance of Managers
缓	257	1,189	8	Postpone
美国法院	58	101	0	American Courts
联邦法院	9	16	0	federal court
苏总	209	510	0	GM Su
苏晓华	299	1,019	0	Su Xiaohua
董事长	817	3,687	13	Chairman
薪金	196	733	0	Salary
藉口	0	0	0	Excuse
补贴	489	1,795	33	Allowance
解除	497	1,643	3	Dissolve
证人	614	1,443	1	witness
证据	1,336	3,546	0	Evidence
诉讼	1,221	3,271	25	Litigation
调岗	5	7	0	Transfer jobs
赴港澳	14	78	0	to Hong Kong and Macau
辞职	138	583	1	Quit
返聘	20	310	0	Rehire
退休	642	2,776	24	Retire
通行证	77	255	0	Travel permit
邀请函	69	126	9	invitation letter
郭泉	99	262	0	Guo Quan

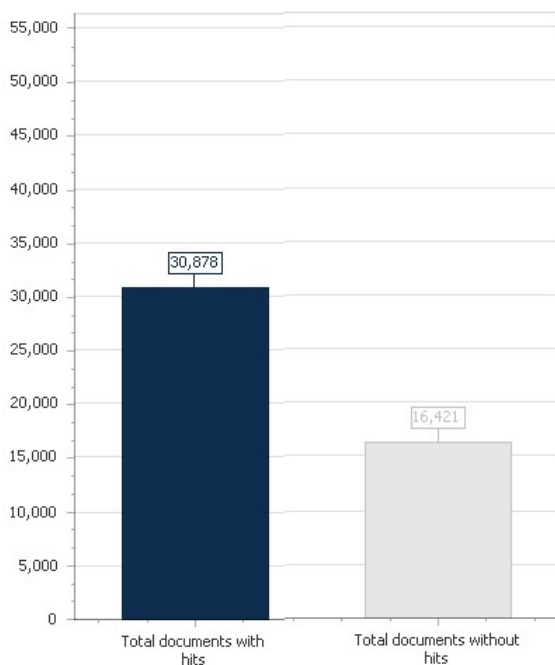
Term	Documents with hits	Documents with hits, including Family	Unique hits	Translation/Note
配合	664	3,456	13	Cooperate
闫云龙	994	2,576	0	Yan Yunlong
阳元江	78	126	1	Yang Yuanjiang
顾问	775	1,732	9	Consultant
领导	1,405	4,567	130	Leadership
香港	1,730	4,574	267	Hong Kong
马丁	160	574	0	Ma Ding
高倩	222	582	1	Gao Qian

# Attachment D



## Irico Search Terms Report

Report Name: 100923 Plaintiffs' Terms Terms on BM  
Data



### Results Summary

Documents in searchable set	Total documents with hits	Total documents without hits
56325	30878	16421

### Terms Summary

Term	Documents with hits	Unique hits	Translation/Note
"100751"	232	0	Su Xiaohua's employee number
"[REDACTED]"	82	1	Su Xiaohua's ID number
bai	4	0	Bai Jiangang's email ID
baoyong	1	0	Bao Yong's email ID
CRT	571	36	
gqian	13	3	Gao Qian's email ID
gquan	4	1	Guo Quan's email ID
jiaorg	4	0	Jiao Rungang's email ID
mad	4	0	Ma Ding's email ID
mail(sxh@ch.com.cn)	7	0	Su Xiaohua's work email
shangtt123	8	0	Shang Tingting's email ID
shf	6	0	Shi Feng's email ID
sxh	8	0	Su Xiaohua's email ID
wzj-xs	1	0	Wang Zhaojie's email ID
Xiaohua	8	0	
yanyunlong	17	0	Yan Yunlong's email ID
zhangwenkai0713	21	0	Zhang's email ID
专题会	906	31	Special Topic Meeting
个人账户	30	0	Personal Account (Pension)



Term	Documents with hits	Unique hits	Translation/Note
人力资源部	3,631	257	Human Resources Department
作证	401	7	testify
保险	1,448	49	Insurance
借口	26	0	Excuse
养老	762	29	Retirement
加州	85	0	California
劳务	1,980	109	Labor Contract
劳动关系	672	6	Relationship of Employment
包勇	1,447	517	Bao Yong
华南	2,010	347	Southern China
反垄断	544	12	Antitrust
取证	237	16	deposition
司云聪	1,276	73	Si Yuncong
司总	2,543	81	Chairman Si
奖励	2,657	90	Reward
奖金	1,503	7	Bonus
实业	5,448	843	Industry
尚婷婷	345	76	Shang Ting Ting
年金	268	11	Pension
延	2,784	188	Postpone
张文凯	1,633	508	Zhang Wenkai
彩管	395	6	CRT
总经理	5,470	117	General Manager
慢	315	40	Slow (to slow)
承诺书	376	34	Declaration of personnel traveling abroad
拖	642	33	Delay
提前	2,021	252	ahead of time
法务	767	35	Legal Affairs
法律事务	1,108	7	Legal Affairs
澳门	296	5	Macau
焦润刚	988	166	Jiao Rungang
王昭杰	440	5	Wang Zhaojie
申请	3,803	562	Application
白建刚	873	109	Bai Jiangang
百尺竿头	7	0	Zhang Wenkai's WeChat alias
石峰	3,095	1,357	Shi Feng
离岗	1,307	8	Depart from Post
离职	993	48	Depart from Post
签证	112	1	Visa
绩效	3,866	109	Performance
绩效考评办法	522	0	Method for Managing and Evaluating Performance of Managers
缓	1,007	147	Postpone
美国法院	79	0	American Courts
联邦法院	44	0	federal court
苏总	544	98	GM Su
苏晓华	2,638	297	Su Xiaohua

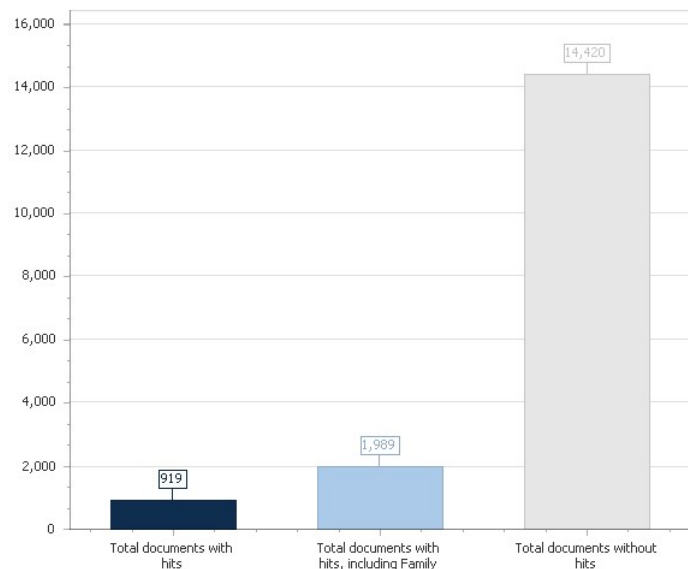
Term	Documents with hits	Unique hits	Translation/Note
董事长	2,281	21	Chairman
薪金	937	0	Salary
藉口	0	0	Excuse
补贴	2,143	56	Allowance
解除	1,964	36	Dissolve
证人	380	5	witness
证据	607	11	Evidence
诉讼	1,506	43	Litigation
调岗	78	0	Transfer jobs
赴港澳	43	0	to Hong Kong and Macau
辞职	555	0	Quit
返聘	746	0	Rehire
退休	2,894	72	Retire
通行证	227	5	Travel permit
邀请函	101	3	invitation letter
郭泉	1,474	517	Guo Quan
配合	2,521	132	Cooperate
闫云龙	854	43	Yan Yunlong
阳元江	1,025	188	Yang Yuanjiang
顾问	1,481	13	Consultant
领导	12,985	3,029	Leadership
香港	1,259	176	Hong Kong
马丁	248	17	Ma Ding
高倩	3,069	1,921	Gao Qian

# Attachment E



## Irico Search Terms Report

**Report Name:** 100923 Proposed Terms Terms Searches on Email Sever Data  
**Searchable Set:** 0237 Keyword Search Scope of Email Server on All



### Results Summary

Documents in searchable set	Total documents with hits	Total documents with hits, including Family	Total documents without hits
16409	919	1989	14420

### Terms Summary

Term	Documents with hits	Documents with hits, including Family	Unique hits	Translation/Note
"4月7日" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	19	79	0	[variations of potentially relevant dates]
"5月25日" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	33	59	0	[variations of potentially relevant dates]
"6月17日" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	27	130	0	[variations of potentially relevant dates]
"交接" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	12	68	0	handover
"任职年龄上限" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	1	3	0	upper age limit for appointment
"作证" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	169	377	4	testify
"免职" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	25	25	0	removal

Term	Documents with hits	Documents with hits, including Family	Unique hits	Translation/Note
"内退" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	35	47	0	retreat
"尊坤" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	2	5	0	Zunkun
"尊坤" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	1	2	0	Zunshen
"报告" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	137	740	0	report
"推荐" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	29	106	1	recommend
"新单位" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	0	0	0	new unit
"新职位" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	0	0	0	new position
"最后工作日" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	1	4	0	last day
"深圳" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	103	349	2	Shenzhen
"离任" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	27	66	0	leaving office
"离岗" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	39	57	0	leaving post
"终止" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	33	198	0	termination
"美国" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	126	445	0	United States
"老母亲" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	0	0	0	old mother

Term	Documents with hits	Documents with hits, including Family	Unique hits	Translation/Note
"证人" AND (苏晓华 OR "Xiaohua" OR ██████████ OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	134	317	0	witness
"辞职" AND (苏晓华 OR "Xiaohua" OR ██████████ OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	73	172	0	resign
"退休" AND (苏晓华 OR "Xiaohua" OR ██████████ OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	80	407	0	retire
("4-7" OR "4.7") AND (苏晓华 OR "Xiaohua" OR ██████████ OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	37	204	5	[variations of potentially relevant dates]
("5-25" OR "5.25") AND (苏晓华 OR "Xiaohua" OR ██████████ OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	37	287	3	[variations of potentially relevant dates]
("6-17" OR "6.17") AND (苏晓华 OR "Xiaohua" OR ██████████ OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	23	129	4	[variations of potentially relevant dates]
bai AND (苏晓华 OR "Xiaohua" OR ██████████ OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	1	4	0	Bai Jiangang's email ID
baoyong AND (苏晓华 OR "Xiaohua" OR ██████████ OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	0	0	0	Bao Yong's email ID
CRT AND (苏晓华 OR "Xiaohua" OR ██████████ OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	202	678	40	
gqian AND (苏晓华 OR "Xiaohua" OR ██████████ OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	0	0	0	Gao Qian's email ID
gquan AND (苏晓华 OR "Xiaohua" OR ██████████ OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	0	0	0	Guo Quan's email ID
jiaorg AND (苏晓华 OR "Xiaohua" OR ██████████ OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	0	0	0	Jiao Rungang's email ID
mad AND (苏晓华 OR "Xiaohua" OR ██████████ OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	23	57	0	Ma Ding's email ID
shangtt123 AND (苏晓华 OR "Xiaohua" OR ██████████ OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	0	0	0	Shang Tingting's email ID

Term	Documents with hits	Documents with hits, including Family	Unique hits	Translation/Note
shf AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	0	0	0	Shi Feng's email ID
wzj-xs AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	17	47	0	Wang Zhaojie's email ID
yanyunlong AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	233	708	2	Yan Yunlong's email ID
zhangwenkai0713 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	269	705	1	Zhang's email ID
专题会 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	3	9	0	Special Topic Meeting
个人账户 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	9	15	2	Personal Account (Pension)
人力资源部 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	84	409	0	Human Resources Department
保险 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	38	205	1	Insurance
借口 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	0	0	0	Excuse
养老 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	24	62	0	Retirement
加州 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	3	7	0	California
劳务 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	33	206	0	Labor Contract
劳动关系 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	39	162	0	Relationship of Employment
包勇 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	28	33	0	Bao Yong

Term	Documents with hits	Documents with hits, including Family	Unique hits	Translation/Note
华南 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	16	100	0	Southern China
反垄断 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	106	408	0	Antitrust
取证 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	14	67	0	deposition
司云聪 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	97	456	0	Si Yuncong
司总 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	84	349	0	Chairman Si
奖励 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	26	101	0	Reward
奖金 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	6	75	0	Bonus
实业 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	77	289	0	Industry
尚婷婷 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	5	15	0	Shang Ting Ting
年金 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	3	31	0	Pension
延 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	95	309	0	Postpone
张文凯 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	279	865	0	Zhang Wenkai
彩管 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	42	334	0	CRT
总经理 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	88	547	0	General Manager



Term	Documents with hits	Documents with hits, including Family	Unique hits	Translation/Note
慢 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	1	2	0	Slow (to slow)
承诺书 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	30	58	3	Declaration of personnel traveling abroad
拖 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	10	40	0	Delay
提前 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	71	123	0	ahead of time
法务 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	32	248	1	Legal Affairs
法律事务 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	201	601	0	Legal Affairs
澳门 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	89	258	0	Macau
焦润刚 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	5	15	0	Jiao Rungang
王昭杰 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	146	655	2	Wang Zhaojie
申请 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	105	350	3	Application
白建刚 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	11	52	0	Bai Jiangang
百尺竿头 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	0	0	0	[Zhang Wenkai's WeChat alias]
石峰 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	32	46	0	Shi Feng
离职 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	143	555	1	Depart from Post

Term	Documents with hits	Documents with hits, including Family	Unique hits	Translation/Note
签证 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	4	27	0	Visa
绩效 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	34	82	1	Performance
绩效考评办法 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	30	37	0	Method for Managing and Evaluating Performance of Managers
缓 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	33	173	0	Postpone
联邦法院 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	3	7	0	federal court
董事长 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	82	545	0	Chairman
薪金 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	0	0	0	Salary
藉口 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	0	0	0	Excuse
补贴 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	31	191	3	Allowance
解除 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	42	135	0	Dissolve
证据 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	275	802	0	Evidence
诉讼 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	151	607	0	Litigation
调岗 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	0	0	0	Transfer jobs
赴港澳 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	9	34	0	to Hong Kong and Macau

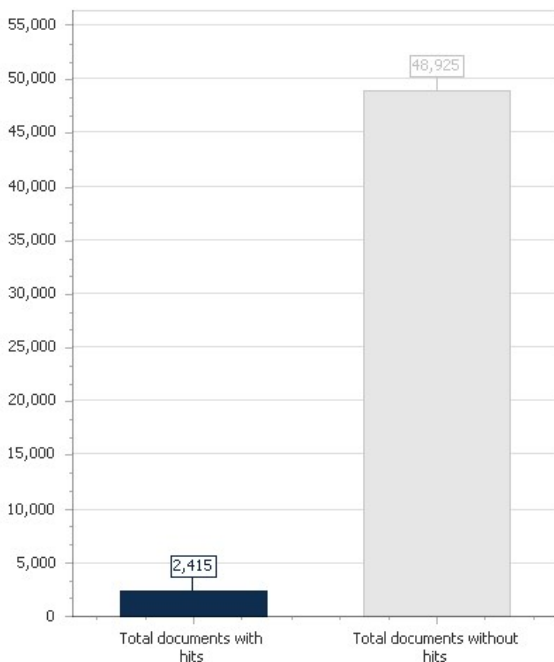
Term	Documents with hits	Documents with hits, including Family	Unique hits	Translation/Note
返聘 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	2	5	0	Rehire
通行证 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	32	75	0	Travel permit
邀请函 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	21	30	1	invitation letter
郭泉 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	5	15	0	Guo Quan
配合 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	107	219	0	Cooperate
闫云龙 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	231	842	7	Yan Yunlong
阳元江 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	29	38	0	Yang Yuanjiang
顾问 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	62	188	0	Consultant
领导 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	113	485	1	Leadership
香港 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	494	807	362	Hong Kong
马丁 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	43	100	0	Ma Ding
高倩 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	0	0	0	Gao Qian

# Attachment F



## Irico Search Terms Report

Report Name: 100923 Proposed Terms on BM Data



### Results Summary

Documents in searchable set	Total documents with hits	Total documents without hits
56325	2415	48925

### Terms Summary

Term	Documents with hits	Unique hits	Translation/Note
"4月7日" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	12	0	[variations of potentially relevant dates]
"5月25日" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	19	0	[variations of potentially relevant dates]
"6月17日" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	35	0	[variations of potentially relevant dates]
"交接" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	78	0	handover
"任职年龄上限" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	13	0	upper age limit for appointment

Term	Documents with hits	Unique hits	Translation/Note
"作证" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	50	0	testify
"免职" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	45	0	removal
"内退" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	699	0	retreat
"尊坤" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	0	0	Zunkun
"尊绅" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	0	0	Zunshen
"报告" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	275	13	report
"推荐" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	136	4	recommend
"新单位" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	33	0	new unit
"新职位" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	0	0	new position
"最后工作日" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	0	0	last day
"深圳" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	293	5	Shenzhen
"离任" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	106	0	leaving office

Term	Documents with hits	Unique hits	Translation/Note
"离岗" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	629	2	leaving post
"终止" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	385	0	termination
"美国" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	28	0	United States
"老母亲" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	2	0	old mother
"证人" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	26	0	witness
"辞职" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	60	0	resign
"退休" AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	863	1	retire
("4-7" OR "4.7") AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	144	0	[variations of potentially relevant dates]
("5-25" OR "5.25") AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	8	0	[variations of potentially relevant dates]
("6-17" OR "6.17") AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	22	0	[variations of potentially relevant dates]
bai AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	1	0	Bai Jiangang's email ID
baoyong AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	1	0	Bao Yong's email ID

Term	Documents with hits	Unique hits	Translation/Note
CRT AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	22	6	
gqian AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	1	0	Gao Qian's email ID
gquan AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	1	0	Guo Quan's email ID
jiaorg AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	1	0	Jiao Rungang's email ID
mad AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	1	0	Ma Ding's email ID
shangtt123 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	1	0	Shang Tingting's email ID
shf AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	1	0	Shi Feng's email ID
wzj-xs AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	1	0	Wang Zhaojie's email ID
yanyunlong AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	1	0	Yan Yunlong's email ID
zhangwenkai0713 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	1	0	Zhang's email ID
专题会 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	87	6	Special Topic Meeting
个人账户 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	4	0	Personal Account (Pension)



Term	Documents with hits	Unique hits	Translation/Note
人力资源部 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	132	0	Human Resources Department
保险 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	408	6	Insurance
借口 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	3	0	Excuse
养老 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	382	7	Retirement
加州 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	4	0	California
劳务 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	906	48	Labor Contract
劳动关系 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	247	0	Relationship of Employment
包勇 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	34	0	Bao Yong
华南 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	550	36	Southern China
反垄断 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	37	4	Antitrust
取证 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	47	0	deposition
司云聪 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	49	0	Si Yuncong

Term	Documents with hits	Unique hits	Translation/Note
司总 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	119	2	Chairman Si
奖励 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	597	5	Reward
奖金 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	741	0	Bonus
实业 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	648	68	Industry
尚婷婷 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	12	0	Shang Ting Ting
年金 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	38	1	Pension
延 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	199	4	Postpone
张文凯 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	54	2	Zhang Wenkai
彩管 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	20	0	CRT
总经理 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	687	11	General Manager
慢 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	16	2	Slow (to slow)
承诺书 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	53	1	Declaration of personnel traveling abroad

Term	Documents with hits	Unique hits	Translation/Note
拖 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	77	0	Delay
提前 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	118	5	ahead of time
法务 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	106	6	Legal Affairs
法律事务 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	73	0	Legal Affairs
澳门 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	52	0	Macau
焦润刚 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	9	0	Jiao Rungang
王昭杰 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	53	0	Wang Zhaojie
申请 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	310	19	Application
白建刚 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	20	0	Bai Jiangang
百尺竿头 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	0	0	[Zhang Wenkai's WeChat alias]
石峰 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	49	2	Shi Feng
离职 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	84	0	Depart from Post

Term	Documents with hits	Unique hits	Translation/Note
签证 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	41	0	Visa
绩效 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	846	5	Performance
绩效考核办法 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	22	0	Method for Managing and Evaluating Performance of Managers
缓 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	116	0	Postpone
联邦法院 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	3	0	federal court
董事长 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	125	1	Chairman
薪金 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	602	0	Salary
藉口 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	0	0	Excuse
补贴 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	767	3	Allowance
解除 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	412	1	Dissolve
证据 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	98	0	Evidence
诉讼 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	187	0	Litigation

Term	Documents with hits	Unique hits	Translation/Note
调岗 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	22	0	Transfer jobs
赴港澳 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	7	0	to Hong Kong and Macau
返聘 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	407	0	Rehire
通行证 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	44	0	Travel permit
邀请函 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	8	0	invitation letter
郭泉 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	24	0	Guo Quan
配合 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	222	13	Cooperate
闫云龙 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	54	2	Yan Yunlong
阳元江 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	43	0	Yang Yuanjiang
顾问 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	482	0	Consultant
领导 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	964	48	Leadership
香港 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	191	1	Hong Kong

Term	Documents with hits	Unique hits	Translation/Note
马丁 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	18	0	Ma Ding
高倩 AND (苏晓华 OR "Xiaohua" OR [REDACTED] OR "100751" OR mail(sxh@ch.com.cn) OR 苏总 OR "sxh")	21	0	Gao Qian

# Attachment G

**Carter, Tom**

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**From:** Lauren Russell <LaurenRussell@TATP.com>  
**Sent:** Friday, October 6, 2023 8:00 PM  
**To:** Werbel, Evan; Carter, Tom; Matthew Heaphy; Rick Saveri  
**Cc:** Geoff Rushing; David Hwu; Mario Alioto; Dan Birkhaeuser; Alan Plutzik; Taladay, John; Lucarelli, Drew; kaylee.yang@nortonrosefulbright.com; Geraldine W. Young  
**Subject:** RE: In re Cathode Ray Tube (CRT) Antitrust Litigation – MDL No. 1917, Master File No. 07-CV-5944-JST

[EXTERNAL EMAIL]

Evan:

We have discussed and considered your request that Plaintiffs agree to your proposed limitations of our search terms, but we cannot agree to your request. We are not able to test your proposed limiters or have any visibility into the results of the searches to know whether responsive documents are being missed.

Judge Walker's Order requires Baker Botts to search for and "produce to plaintiffs *all* non-privileged documents responsive to the Su Order and this order and a privilege log for any withheld documents." Interim Order at 9 (emphasis added). Plaintiffs cannot modify this requirement. Judge Walker gave Plaintiffs the opportunity to propose search terms, which we did, but ultimately it is Baker Botts' responsibility to ensure that whatever search methodologies are used, all responsive documents are captured.

As for your requested extension of time to comply with Judge Walker's Order, that request is more appropriately directed to Judge Walker. However, Plaintiffs note that you were aware of Plaintiffs' search terms as well as any Chinese government review requirements when you requested the three-week extension. In addition, given that you are only looking for documents relating to Mr. Su's resignation, many relevant documents should be identifiable without search terms. Any such documents should be produced by the current deadline, along with the other information ordered by Judge Walker that does not involve review of search results.

Regards,

Lauren

Lauren C. Capurro (Russell)  
Attorney at Law  
Trump, Alioto, Trump & Prescott, LLP  
Telephone: (415) 860-5051  
E-mail: [lauren russell@t ATP.com](mailto:lauren russell@t ATP.com)

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**From:** Werbel, Evan <evan.werbel@bakerbotts.com>  
**Sent:** Friday, October 6, 2023 3:37 PM  
**To:** Carter, Tom <Tom.Carter@BakerBotts.com>; Matthew Heaphy <mheaphy@saveri.com>; Rick Saveri <rick@saveri.com>; Lauren Russell <LaurenRussell@TATP.com>  
**Cc:** Geoff Rushing <geoff@saveri.com>; David Hwu <dhwu@saveri.com>; Mario Alioto <MAlioto@TATP.com>; Dan



Birkhaeuser <[dbirkhaeuser@bramsonplutzik.com](mailto:dbirkhaeuser@bramsonplutzik.com)>; Alan Plutzik <[aplutzik@bramsonplutzik.com](mailto:aplutzik@bramsonplutzik.com)>; Taladay, John <[john.taladay@bakerbotts.com](mailto:john.taladay@bakerbotts.com)>; Lucarelli, Drew <[drew.lucarelli@bakerbotts.com](mailto:drew.lucarelli@bakerbotts.com)>; kaylee.yang@nortonrosefulbright.com; Geraldine W. Young <[geraldine.young@nortonrosefulbright.com](mailto:geraldine.young@nortonrosefulbright.com)>  
**Subject:** RE: In re Cathode Ray Tube (CRT) Antitrust Litigation – MDL No. 1917, Master File No. 07-CV-5944-JST

Matt and all, As requested, attached is a list of the 15 custodians that we have been discussing along with information on their relevant positions and entities. We are also looking into the other questions that you raised during our meet and confer today. The preliminary response that we received on deduplication of emails and internal texts is that all the search results have been deduped, but we are confirming further and will get back to you on that issue and the others discussed.

We look forward to hearing from Plaintiffs on the key word searches and on the request for an extension.

Thanks,  
Evan

**Evan J. Werbel**  
**Baker Botts L.L.P.**  
[evan.werbel@bakerbotts.com](mailto:evan.werbel@bakerbotts.com)

T - 202.639.1323

M - 202.744.0819

700 K Street, NW  
Washington, DC 20001  
USA

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**From:** Carter, Tom <[Tom.Carter@BakerBotts.com](mailto:Tom.Carter@BakerBotts.com)>

**Sent:** Thursday, October 5, 2023 4:43 PM

**To:** Matthew Heaphy <[mheaphy@saveri.com](mailto:mheaphy@saveri.com)>; Werbel, Evan <[evan.werbel@bakerbotts.com](mailto:evan.werbel@bakerbotts.com)>; Rick Saveri <[rick@saveri.com](mailto:rick@saveri.com)>; Lauren Capurro <[LaurenRussell@TATP.com](mailto:LaurenRussell@TATP.com)>

**Cc:** Geoff Rushing <[geoff@saveri.com](mailto:geoff@saveri.com)>; David Hwu <[dhwu@saveri.com](mailto:dhwu@saveri.com)>; Mario Alioto <[MAlioto@TATP.com](mailto:MAlioto@TATP.com)>; Dan Birkhaeuser <[dbirkhaeuser@bramsonplutzik.com](mailto:dbirkhaeuser@bramsonplutzik.com)>; Alan Plutzik <[aplutzik@bramsonplutzik.com](mailto:aplutzik@bramsonplutzik.com)>; Taladay, John <[john.taladay@bakerbotts.com](mailto:john.taladay@bakerbotts.com)>; Lucarelli, Drew <[drew.lucarelli@bakerbotts.com](mailto:drew.lucarelli@bakerbotts.com)>; kaylee.yang@nortonrosefulbright.com; Geraldine W. Young <[geraldine.young@nortonrosefulbright.com](mailto:geraldine.young@nortonrosefulbright.com)>

**Subject:** RE: In re Cathode Ray Tube (CRT) Antitrust Litigation – MDL No. 1917, Master File No. 07-CV-5944-JST

Matt, please see attached. The terms added by Irico (not including duplicative terms with Plaintiffs' list) are marked in blue at the bottom of the list.

---

**From:** Matthew Heaphy <[mheaphy@saveri.com](mailto:mheaphy@saveri.com)>

**Sent:** Thursday, October 5, 2023 3:30 PM

**To:** Carter, Tom <[Tom.Carter@BakerBotts.com](mailto:Tom.Carter@BakerBotts.com)>; Werbel, Evan <[evan.werbel@bakerbotts.com](mailto:evan.werbel@bakerbotts.com)>; Rick Saveri <[rick@saveri.com](mailto:rick@saveri.com)>; Lauren Capurro <[LaurenRussell@TATP.com](mailto:LaurenRussell@TATP.com)>

**Cc:** Geoff Rushing <[geoff@saveri.com](mailto:geoff@saveri.com)>; David Hwu <[dhwu@saveri.com](mailto:dhwu@saveri.com)>; Mario Alioto <[MAlioto@TATP.com](mailto:MAlioto@TATP.com)>; Dan Birkhaeuser <[dbirkhaeuser@bramsonplutzik.com](mailto:dbirkhaeuser@bramsonplutzik.com)>; Alan Plutzik <[aplutzik@bramsonplutzik.com](mailto:aplutzik@bramsonplutzik.com)>; Taladay, John <[john.taladay@bakerbotts.com](mailto:john.taladay@bakerbotts.com)>; Lucarelli, Drew <[drew.lucarelli@bakerbotts.com](mailto:drew.lucarelli@bakerbotts.com)>; kaylee.yang@nortonrosefulbright.com; Geraldine W. Young <[geraldine.young@nortonrosefulbright.com](mailto:geraldine.young@nortonrosefulbright.com)>

**Subject:** RE: In re Cathode Ray Tube (CRT) Antitrust Litigation – MDL No. 1917, Master File No. 07-CV-5944-JST

[EXTERNAL EMAIL]

Tom:

Per our discussion, could you please provide a list of Irico's additional search terms?

Thanks,  
Matt

---

**From:** Carter, Tom <[Tom.Carter@BakerBotts.com](mailto:Tom.Carter@BakerBotts.com)>

**Sent:** Thursday, October 5, 2023 11:40 AM

**To:** Matthew Heaphy <[mheaphy@saveri.com](mailto:mheaphy@saveri.com)>; Werbel, Evan <[evan.werbel@bakerbotts.com](mailto:evan.werbel@bakerbotts.com)>; Rick Saveri <[rick@saveri.com](mailto:rick@saveri.com)>; Lauren Capurro <[LaurenRussell@TATP.com](mailto:LaurenRussell@TATP.com)>

**Cc:** Geoff Rushing <[geoff@saveri.com](mailto:geoff@saveri.com)>; David Hwu <[dhwu@saveri.com](mailto:dhwu@saveri.com)>; Mario Alioto <[MAlioto@TATP.com](mailto:MAlioto@TATP.com)>; Dan Birkhaeuser <[dbirkhaeuser@bramsonplutzik.com](mailto:dbirkhaeuser@bramsonplutzik.com)>; Alan Plutzik <[aplutzik@bramsonplutzik.com](mailto:aplutzik@bramsonplutzik.com)>; Taladay, John <[john.taladay@bakerbotts.com](mailto:john.taladay@bakerbotts.com)>; Lucarelli, Drew <[drew.lucarelli@bakerbotts.com](mailto:drew.lucarelli@bakerbotts.com)>;

[kaylee.yang@nortonrosefulbright.com](mailto:kaylee.yang@nortonrosefulbright.com); Geraldine W. Young <[geraldine.young@nortonrosefulbright.com](mailto:geraldine.young@nortonrosefulbright.com)>

**Subject:** RE: In re Cathode Ray Tube (CRT) Antitrust Litigation – MDL No. 1917, Master File No. 07-CV-5944-JST

Matt, for discussion on the call at noon Pacific, please see the attached search term hit reports.

Thanks,  
Tom

---

**From:** Matthew Heaphy <[mheaphy@saveri.com](mailto:mheaphy@saveri.com)>

**Sent:** Thursday, October 5, 2023 1:42 PM

**To:** Werbel, Evan <[evan.werbel@bakerbotts.com](mailto:evan.werbel@bakerbotts.com)>; Rick Saveri <[rick@saveri.com](mailto:rick@saveri.com)>; Lauren Capurro <[LaurenRussell@TATP.com](mailto:LaurenRussell@TATP.com)>

**Cc:** Geoff Rushing <[geoff@saveri.com](mailto:geoff@saveri.com)>; David Hwu <[dhwu@saveri.com](mailto:dhwu@saveri.com)>; Mario Alioto <[MAlioto@TATP.com](mailto:MAlioto@TATP.com)>; Dan Birkhaeuser <[dbirkhaeuser@bramsonplutzik.com](mailto:dbirkhaeuser@bramsonplutzik.com)>; Alan Plutzik <[aplutzik@bramsonplutzik.com](mailto:aplutzik@bramsonplutzik.com)>; Taladay, John <[john.taladay@bakerbotts.com](mailto:john.taladay@bakerbotts.com)>; Carter, Tom <[Tom.Carter@BakerBotts.com](mailto:Tom.Carter@BakerBotts.com)>; Lucarelli, Drew <[drew.lucarelli@bakerbotts.com](mailto:drew.lucarelli@bakerbotts.com)>; [kaylee.yang@nortonrosefulbright.com](mailto:kaylee.yang@nortonrosefulbright.com); Geraldine W. Young <[geraldine.young@nortonrosefulbright.com](mailto:geraldine.young@nortonrosefulbright.com)>

**Subject:** RE: In re Cathode Ray Tube (CRT) Antitrust Litigation – MDL No. 1917, Master File No. 07-CV-5944-JST

[EXTERNAL EMAIL]

Evan:

Plaintiffs are available today at noon Pacific. Could you please circulate a call-in number?

Best,  
Matt

---

**From:** Werbel, Evan <[evan.werbel@bakerbotts.com](mailto:evan.werbel@bakerbotts.com)>

**Sent:** Wednesday, October 4, 2023 1:10 PM

**To:** Rick Saveri <[rick@saveri.com](mailto:rick@saveri.com)>; Lauren Capurro <[LaurenRussell@TATP.com](mailto:LaurenRussell@TATP.com)>

**Cc:** Geoff Rushing <[geoff@saveri.com](mailto:geoff@saveri.com)>; David Hwu <[dhwu@saveri.com](mailto:dhwu@saveri.com)>; Mario Alioto <[MAlioto@TATP.com](mailto:MAlioto@TATP.com)>; Dan Birkhaeuser <[dbirkhaeuser@bramsonplutzik.com](mailto:dbirkhaeuser@bramsonplutzik.com)>; Alan Plutzik <[aplutzik@bramsonplutzik.com](mailto:aplutzik@bramsonplutzik.com)>; Matthew Heaphy <[mheaphy@saveri.com](mailto:mheaphy@saveri.com)>; Taladay, John <[john.taladay@bakerbotts.com](mailto:john.taladay@bakerbotts.com)>; Carter, Tom <[Tom.Carter@BakerBotts.com](mailto:Tom.Carter@BakerBotts.com)>; Lucarelli, Drew <[drew.lucarelli@bakerbotts.com](mailto:drew.lucarelli@bakerbotts.com)>; [kaylee.yang@nortonrosefulbright.com](mailto:kaylee.yang@nortonrosefulbright.com); Geraldine W. Young <[geraldine.young@nortonrosefulbright.com](mailto:geraldine.young@nortonrosefulbright.com)>

**Subject:** In re Cathode Ray Tube (CRT) Antitrust Litigation – MDL No. 1917, Master File No. 07-CV-5944-JST

Lauren and Rick, Are Plaintiffs available tomorrow to meet and confer regarding the search terms for the Su investigation? How about 12:00 Pacific? If that does not work, let us know if there is another time that does.

Thanks,  
Evan

**Evan J. Werbel**

**Baker Botts L.L.P.**

[evan.werbel@bakerbotts.com](mailto:evan.werbel@bakerbotts.com)

T - 202.639.1323

M - 202.744.0819

700 K Street, NW  
Washington, DC 20001  
USA

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ATA Member Number: 248719

## CERTIFIED TRANSLATION

### Description of Document(s):

<b>PROPOSAL ON SU XIAOHUA'S EARLY DEPARTURE FROM MANAGERIAL POSITION</b>
<b>IRI-SU-000402 - IRI-SU-000403</b>

Source Language: <b>CHINESE</b>	Target Language: <b>ENGLISH</b>
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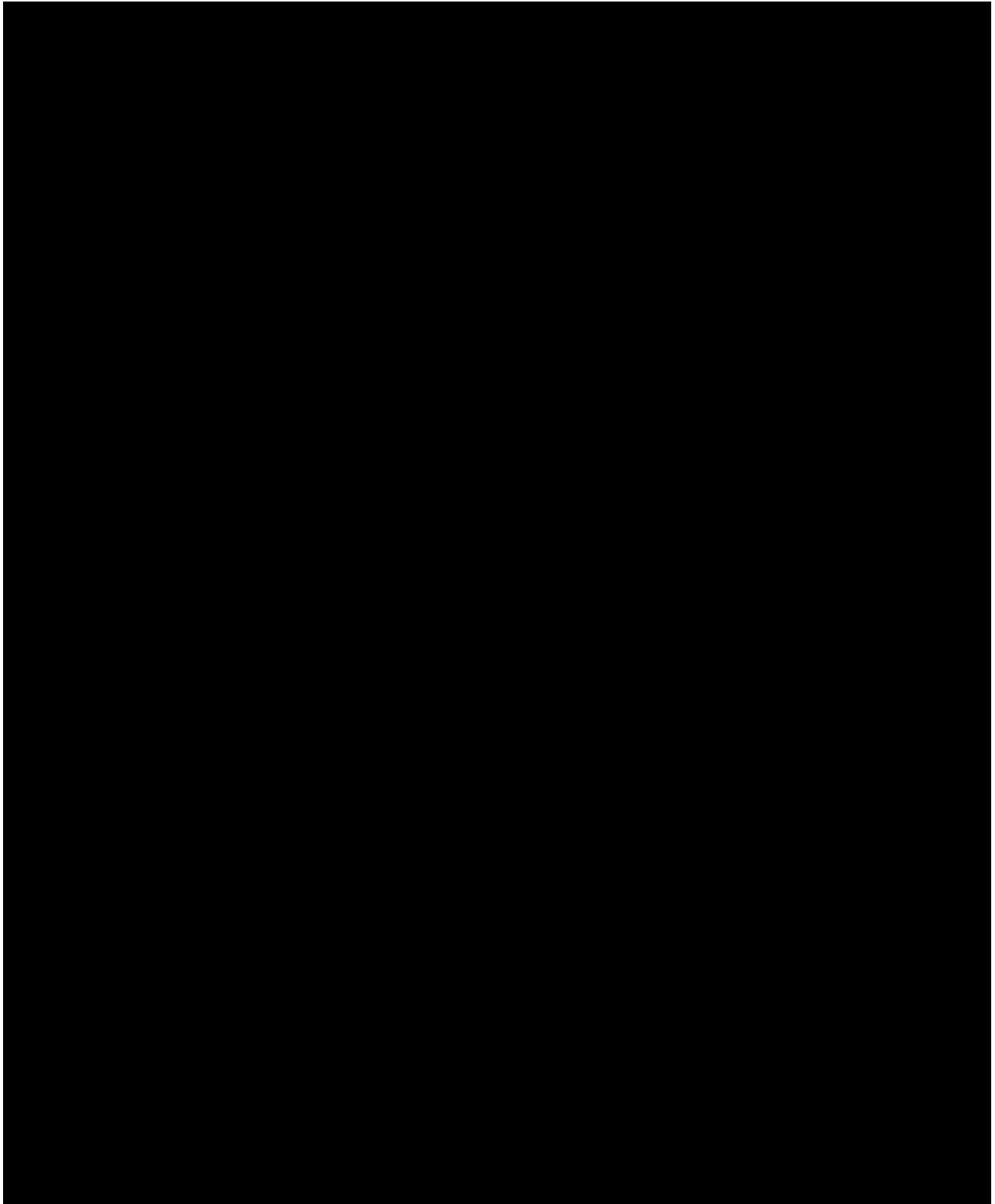
WITH REFERENCE TO THE ABOVE MENTIONED MATERIALS/DOCUMENTS, we at Language Fish LLC (doing business as www.certifiedtranslate.com), a professional document translation company, attest that the language translation completed by Language Fish's certified professional translators, represents, to the best of our judgment, an accurate and correct interpretation of the terminology/content of the source document(s). **This is to certify the correctness of the translation only.** We do not guarantee that the original is a genuine document or that the statements contained in the original document(s) are true.

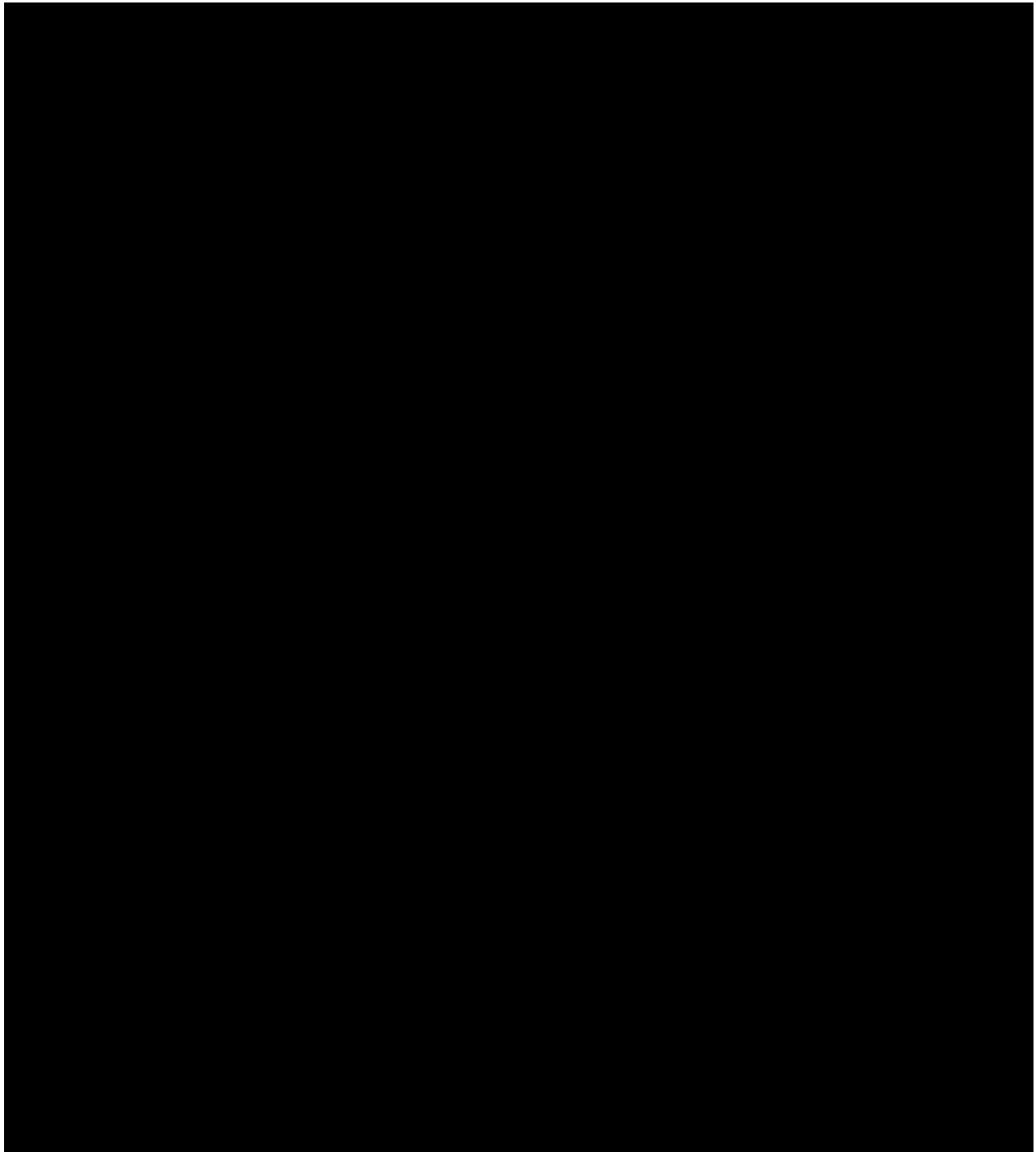
IN WITNESS WHEREOF, Language Fish LLC has caused the Certificate to be signed by its duly authorized officer(s).

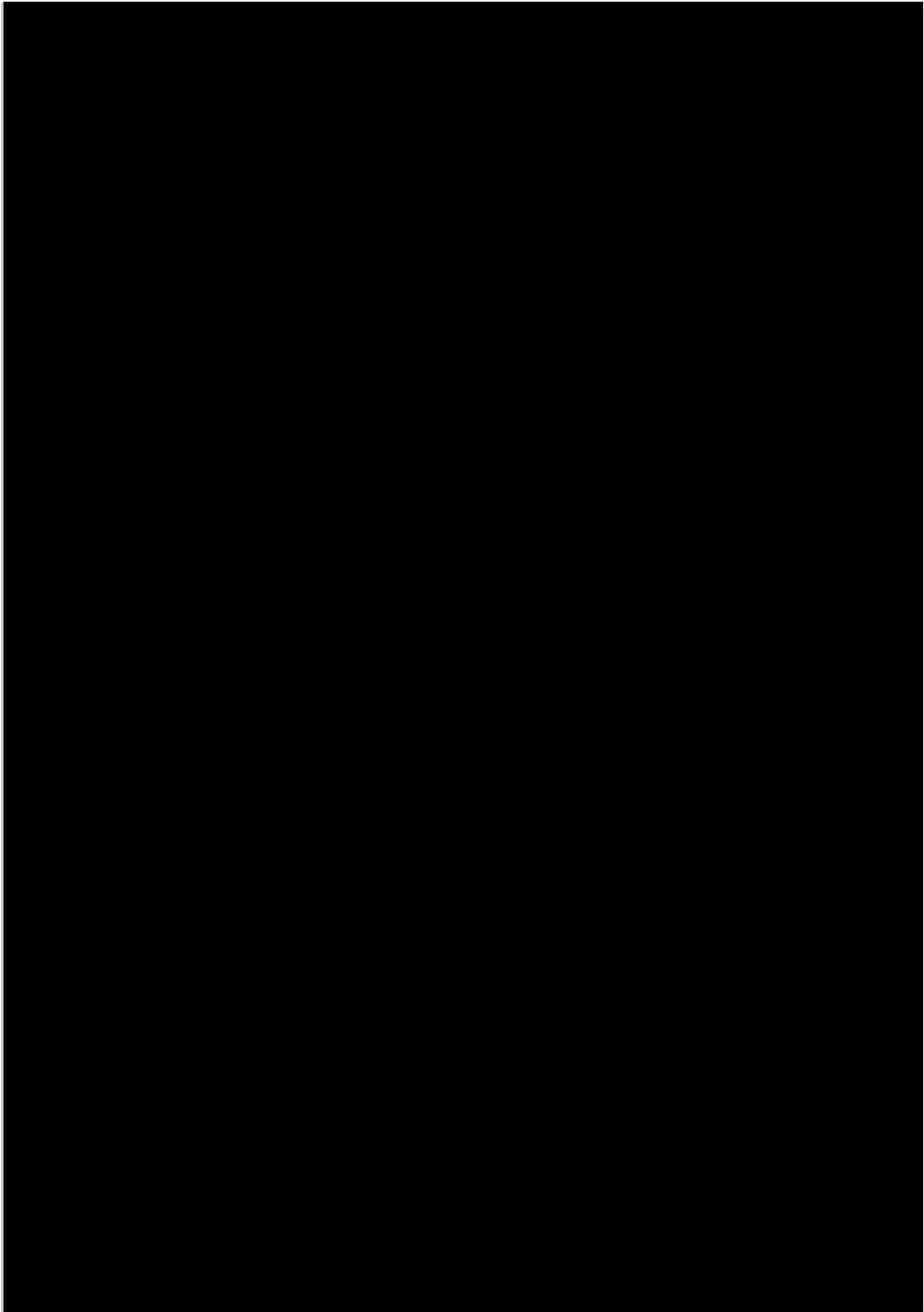
By: Sean Kirschenstein, Director

Date: November 14, 2023

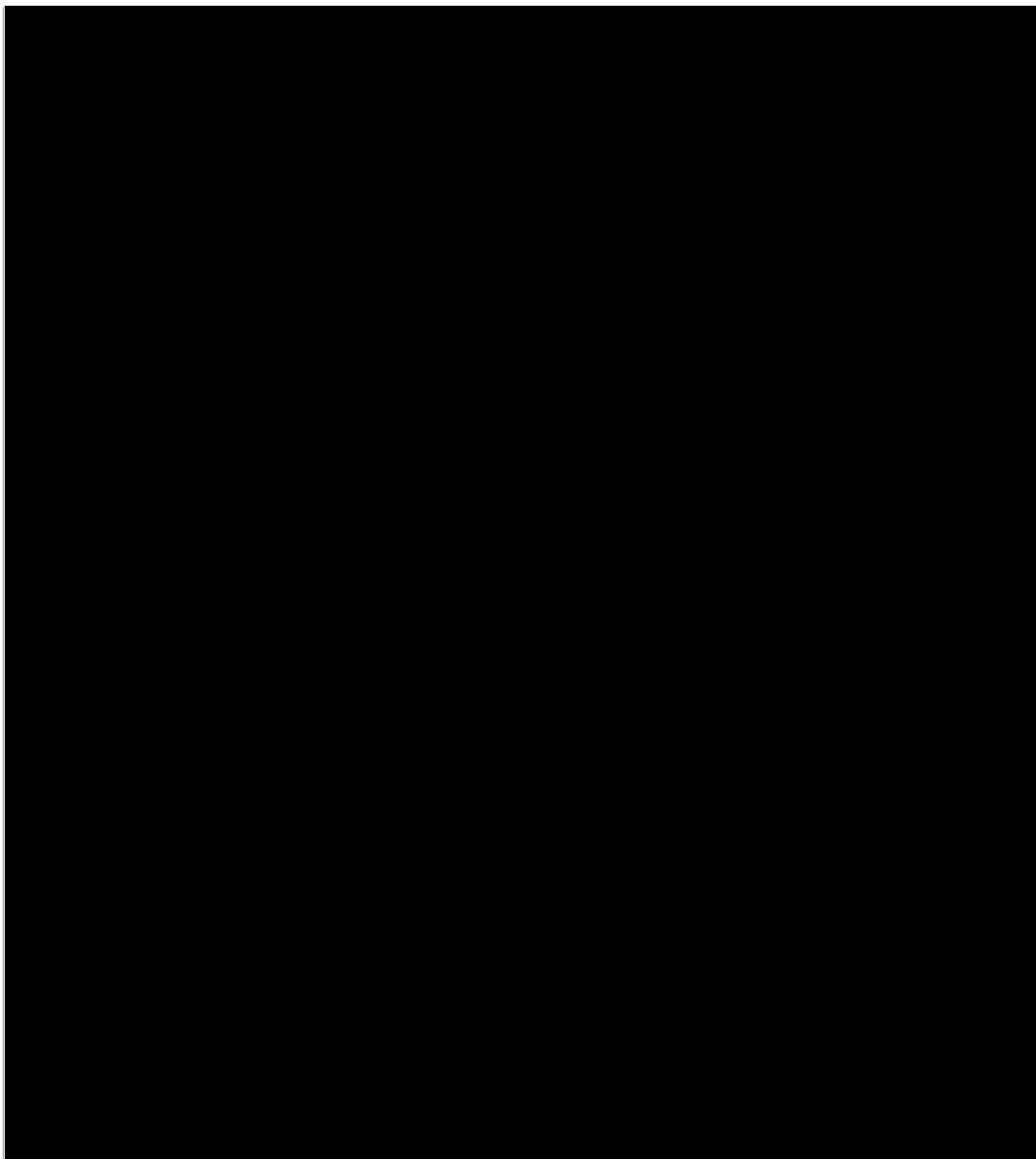
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# **EXHIBIT C**



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## CERTIFIED TRANSLATION

### Description of Document(s):

<b>REGARDING THE PROPOSAL FOR SU XIAOHUA GOING OFF-DUTY EARLY DUE TO</b>
<b>REACHING THE AGE LIMIT FOR HOLDING POSITIONS</b>
<b>IRI-SU-000400</b>

Source Language: <b>CHINESE</b>	Target Language: <b>ENGLISH</b>
---------------------------------	---------------------------------

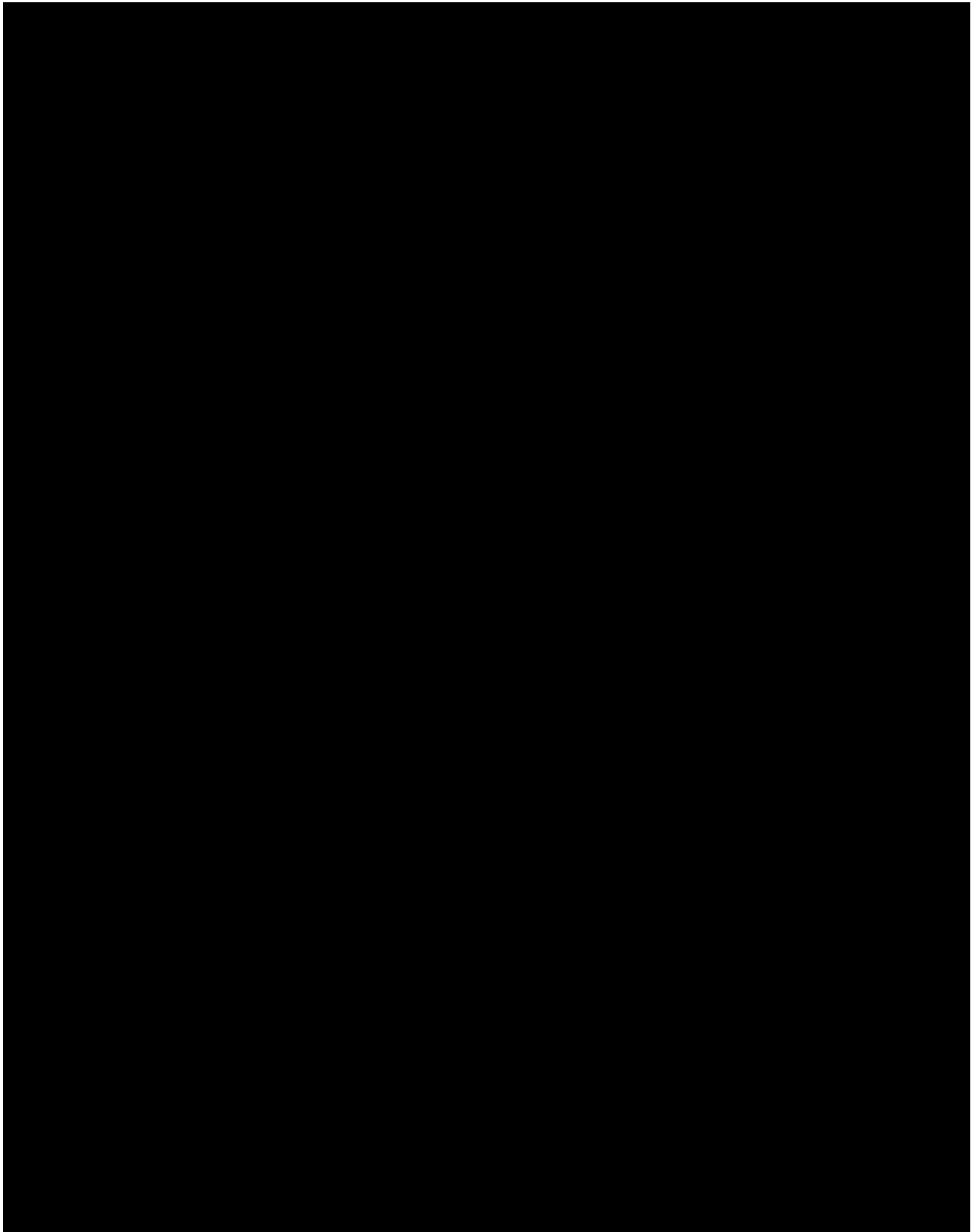
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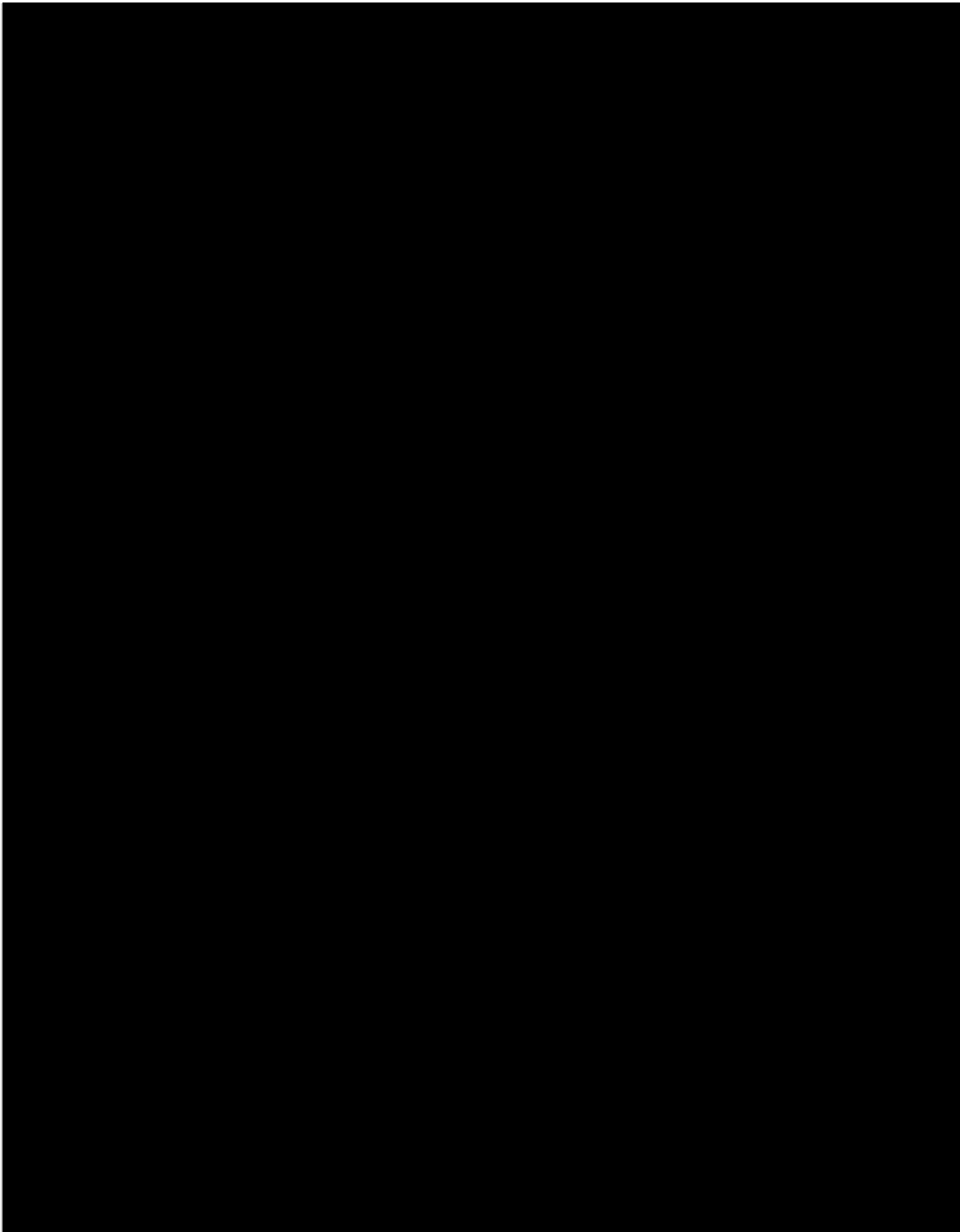
IN WITNESS WHEREOF, Language Fish LLC has caused the Certificate to be signed by its duly authorized officer(s).

**By:** Sean Kirschenstein, Director

**Date:** November 14, 2023

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# **EXHIBIT D**



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## CERTIFIED TRANSLATION

### Description of Document(s):

<b>RESIGNATION REPORT</b>
<b>SU XIAOHUA</b>
<b>IRI-SU-000141</b>

Source Language: <b>CHINESE</b>	Target Language: <b>ENGLISH</b>
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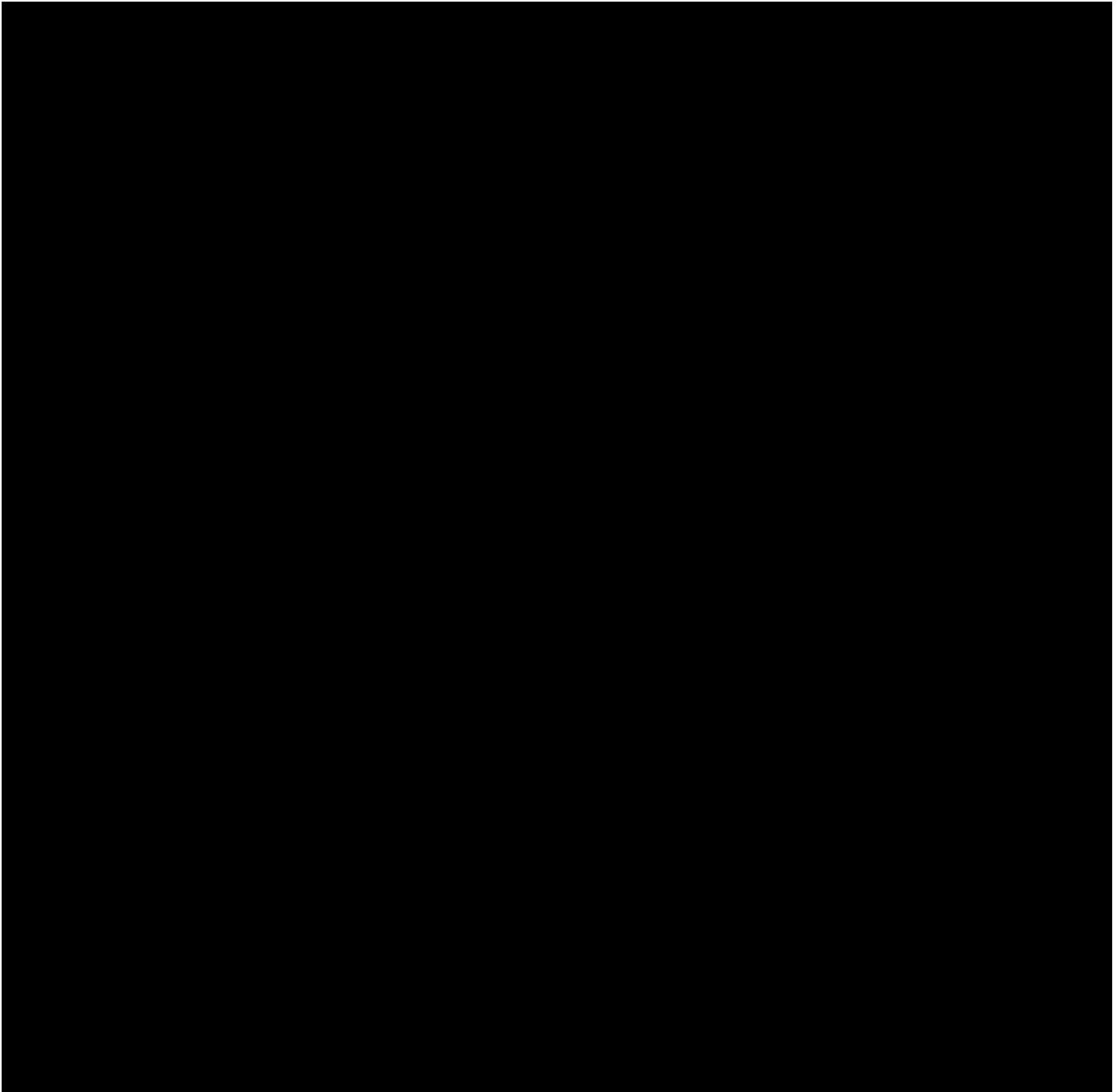
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IN WITNESS WHEREOF, Language Fish LLC has caused the Certificate to be signed by its duly authorized officer(s).

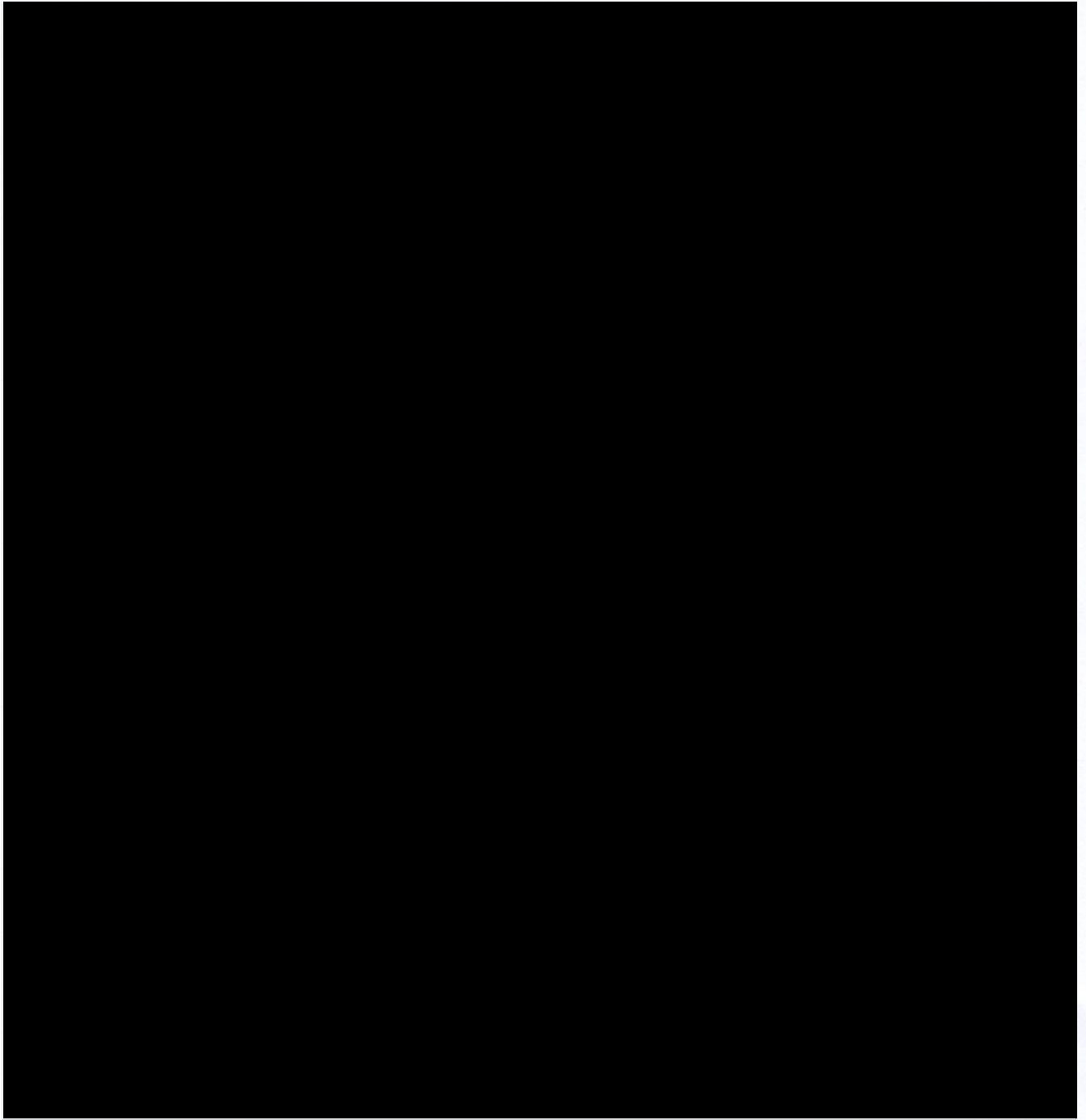
**By:** Sean Kirschenstein, Director

**Date:** March 3, 2023

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## CERTIFIED TRANSLATION

### Description of Document(s):

<b>IRICO GROUP CO., LTD. MEETING MINUTES</b>
<b>APRIL 7, 2022</b>
<b>IRI-SU-000137 through IRI-SU-000140</b>

Source Language: <b>CHINESE</b>	Target Language: <b>ENGLISH</b>
---------------------------------	---------------------------------

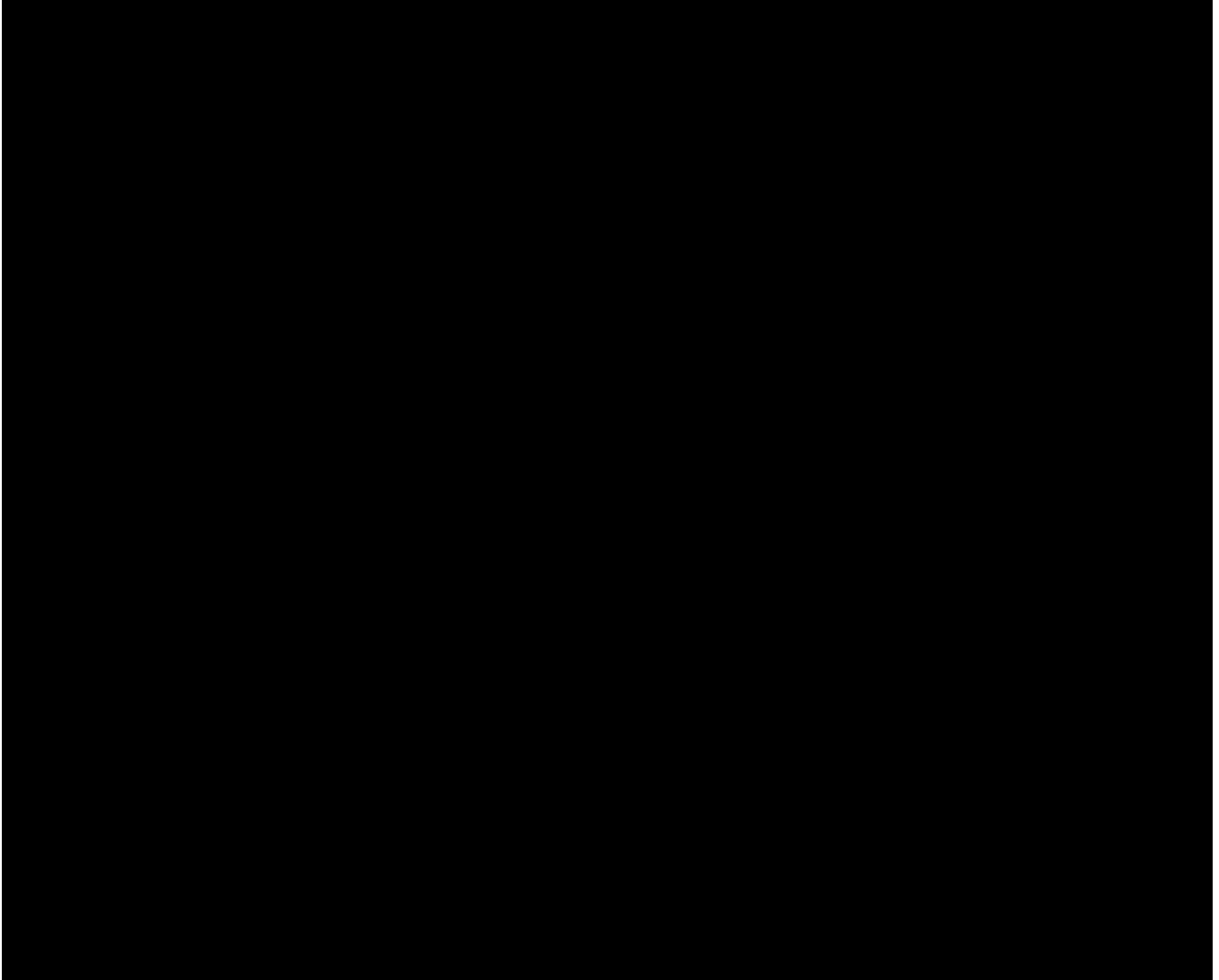
WITH REFERENCE TO THE ABOVE MENTIONED MATERIALS/DOCUMENTS, we at Language Fish LLC (doing business as www.certifiedtranslate.com), a professional document translation company, attest that the language translation completed by Language Fish's certified professional translators, represents, to the best of our judgment, an accurate and correct interpretation of the terminology/content of the source document(s). **This is to certify the correctness of the translation only.** We do not guarantee that the original is a genuine document or that the statements contained in the original document(s) are true.

IN WITNESS WHEREOF, Language Fish LLC has caused the Certificate to be signed by its duly authorized officer(s).

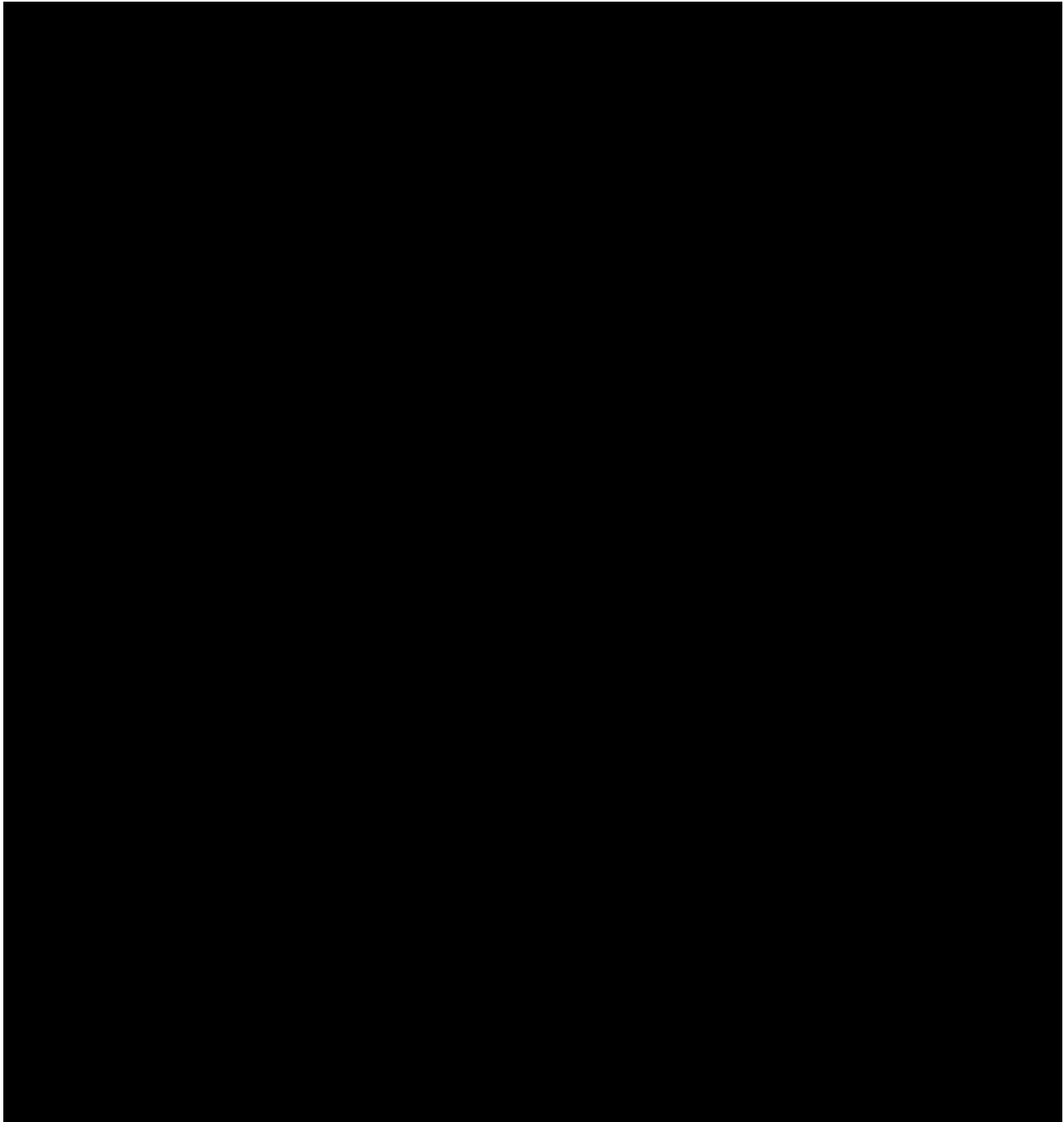
**By:** Sean Kirschenstein, Director

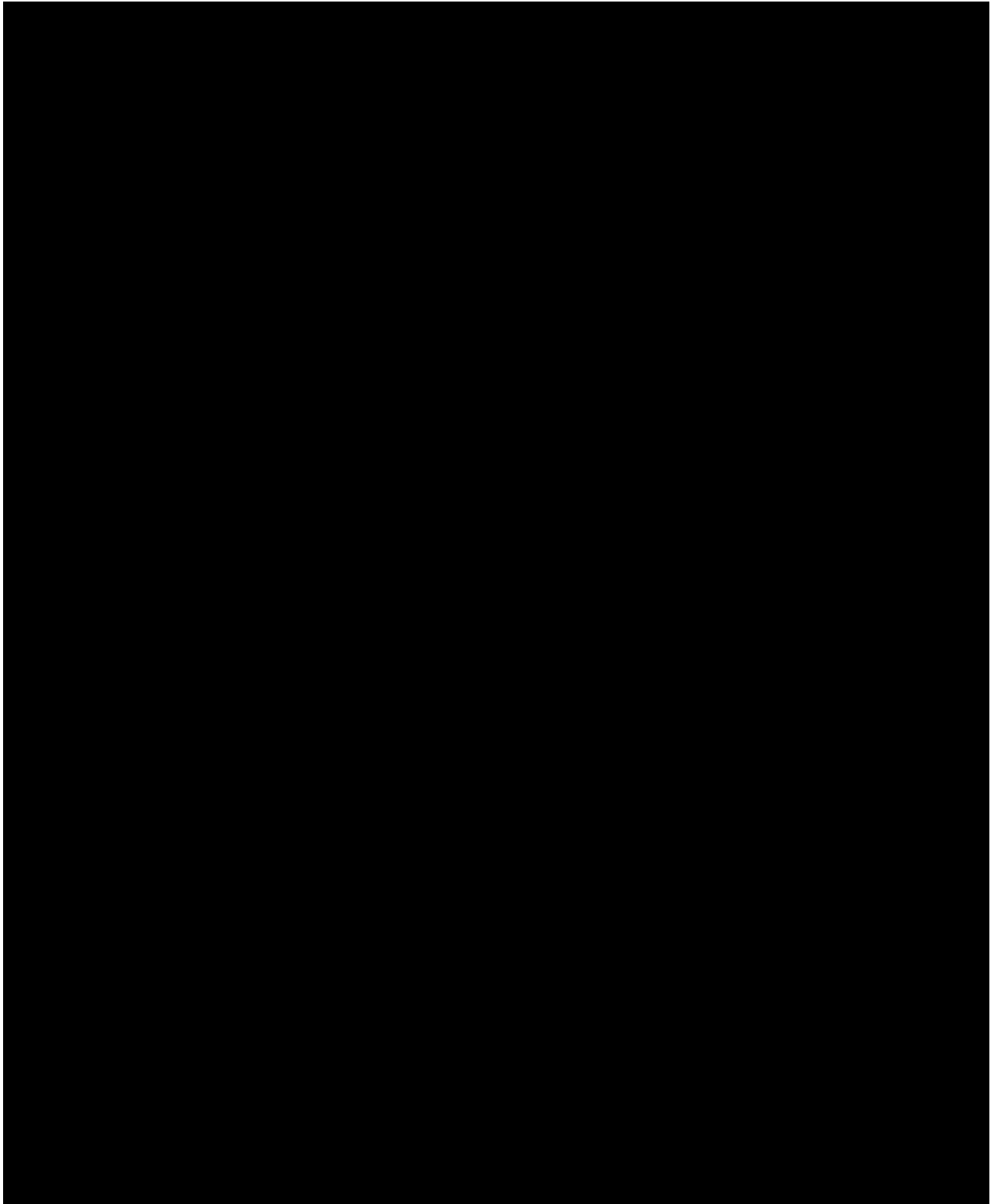
**Date:** January 12, 2023

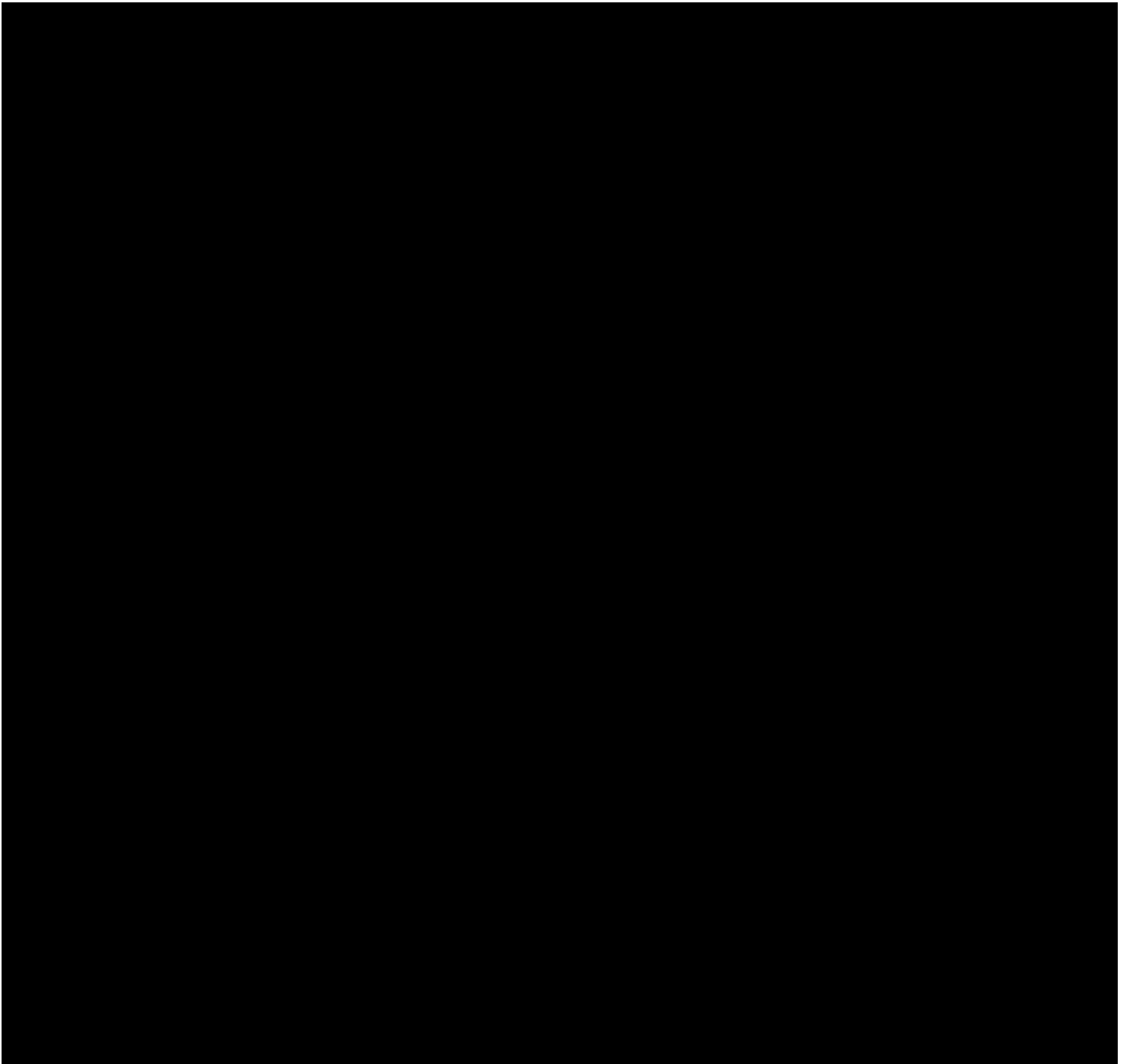
A copy of the translated version(s) is attached to this statement of certification.





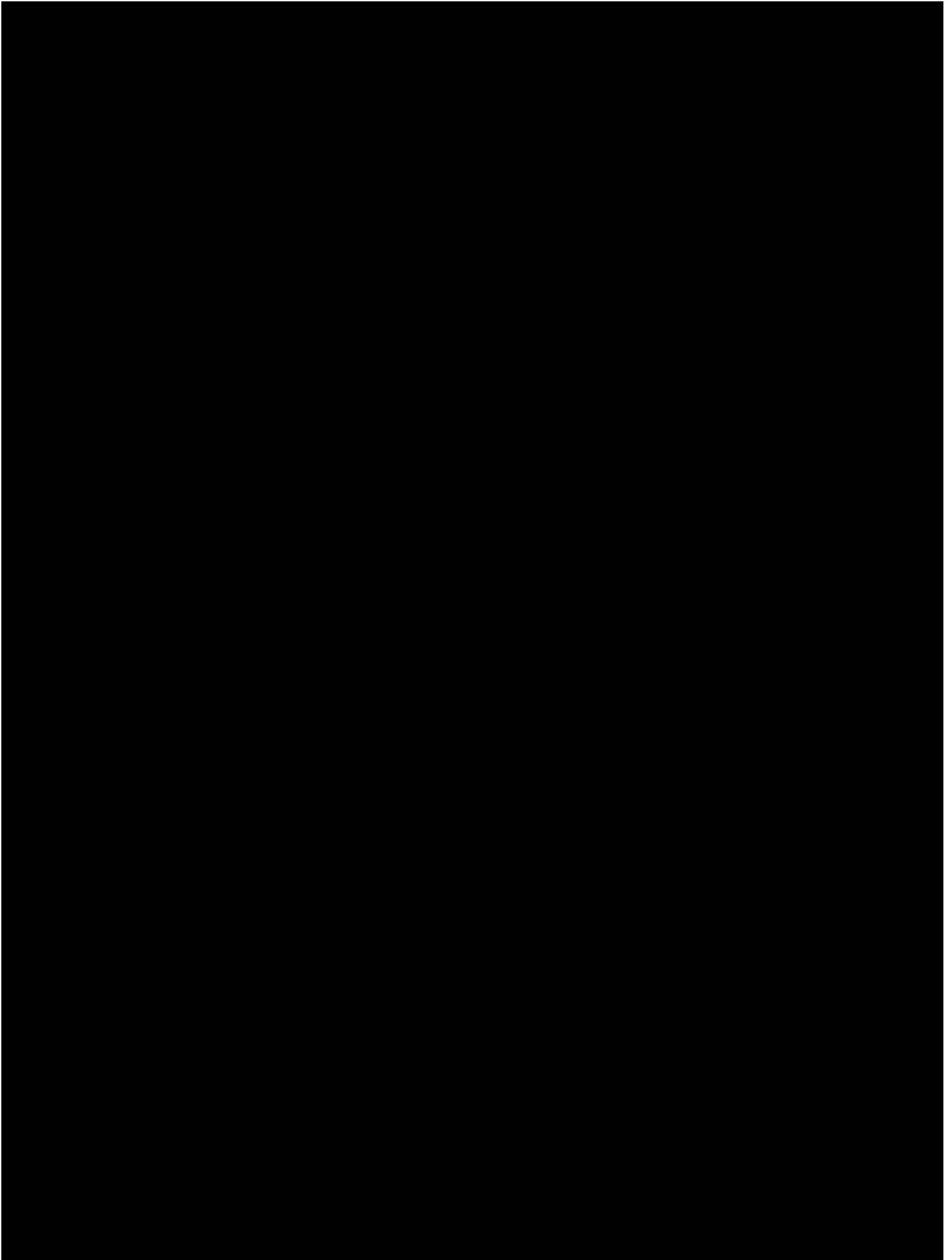


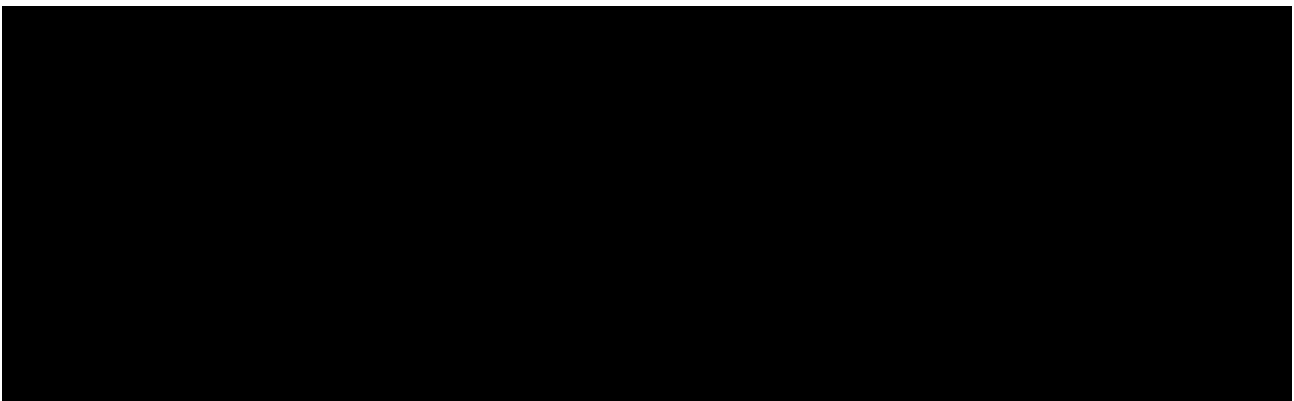
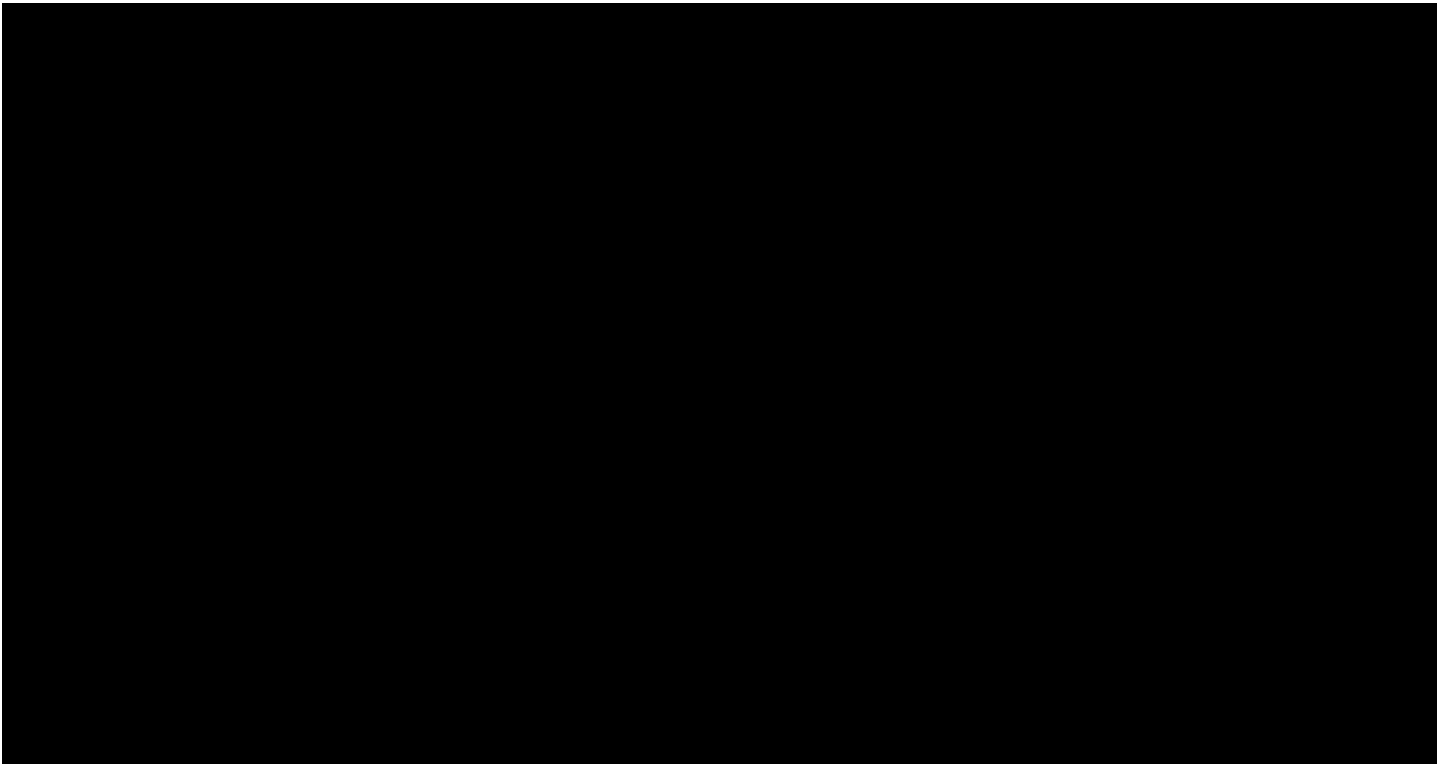












# **EXHIBIT F**



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## CERTIFIED TRANSLATION

### Description of Document(s):

<b>SYSTEM COMMUNICATIONS / EXCEL SHEET</b>
<b>IRI-SU-001356</b>

Source Language: <b>CHINESE</b>	Target Language: <b>ENGLISH</b>
---------------------------------	---------------------------------

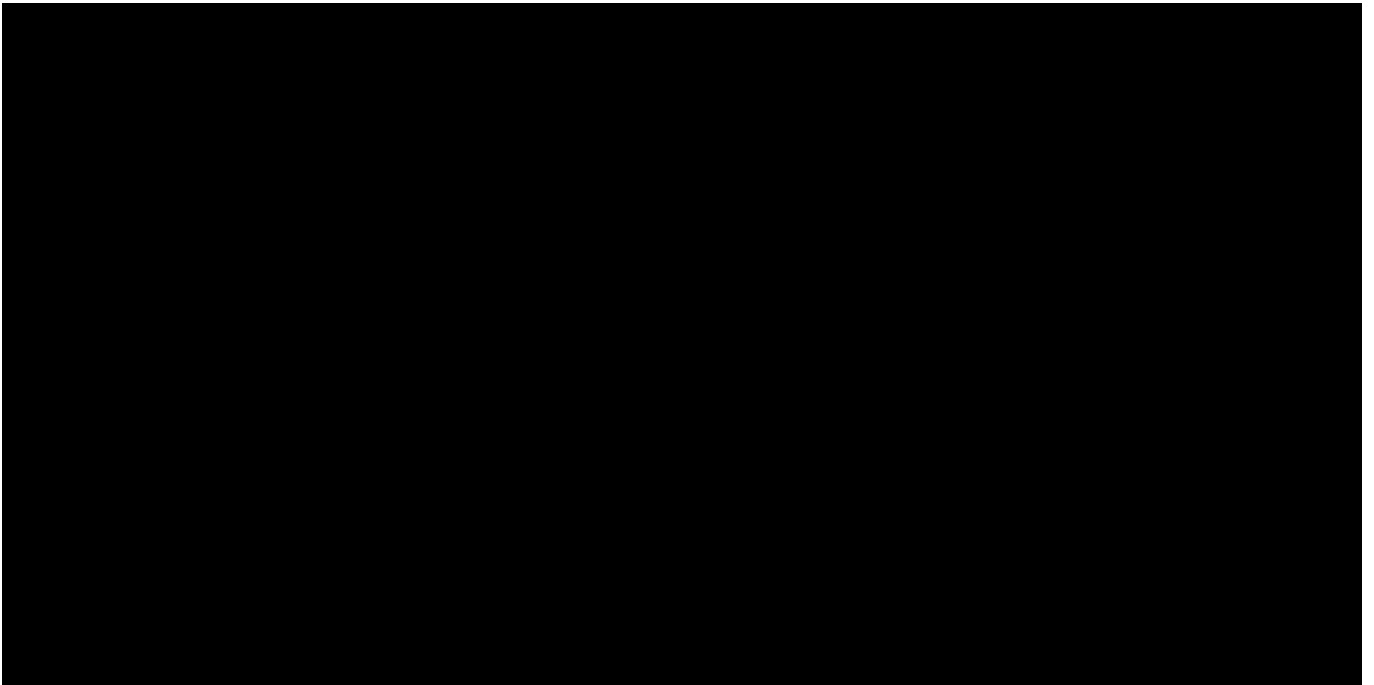
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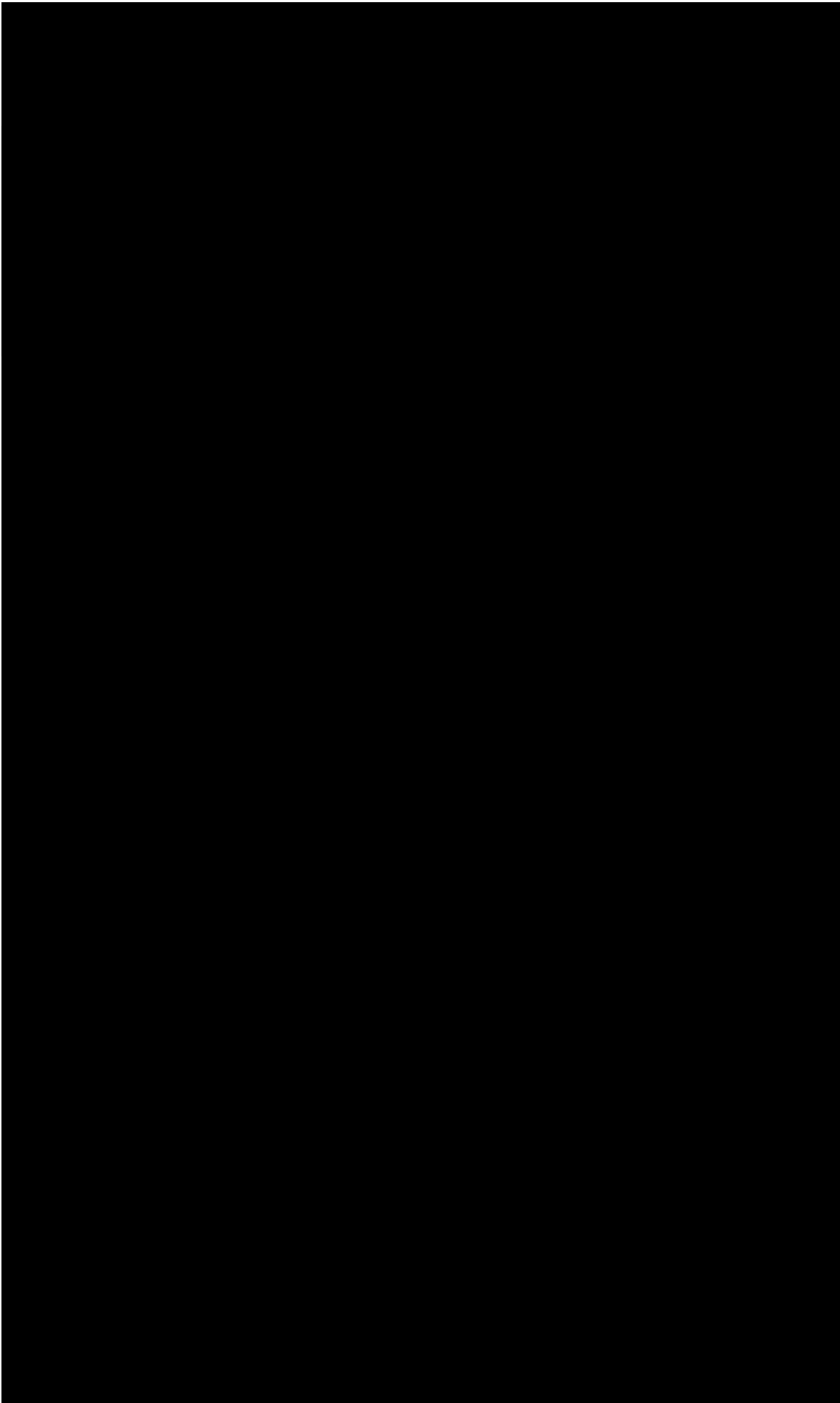
IN WITNESS WHEREOF, Language Fish LLC has caused the Certificate to be signed by its duly authorized officer(s).

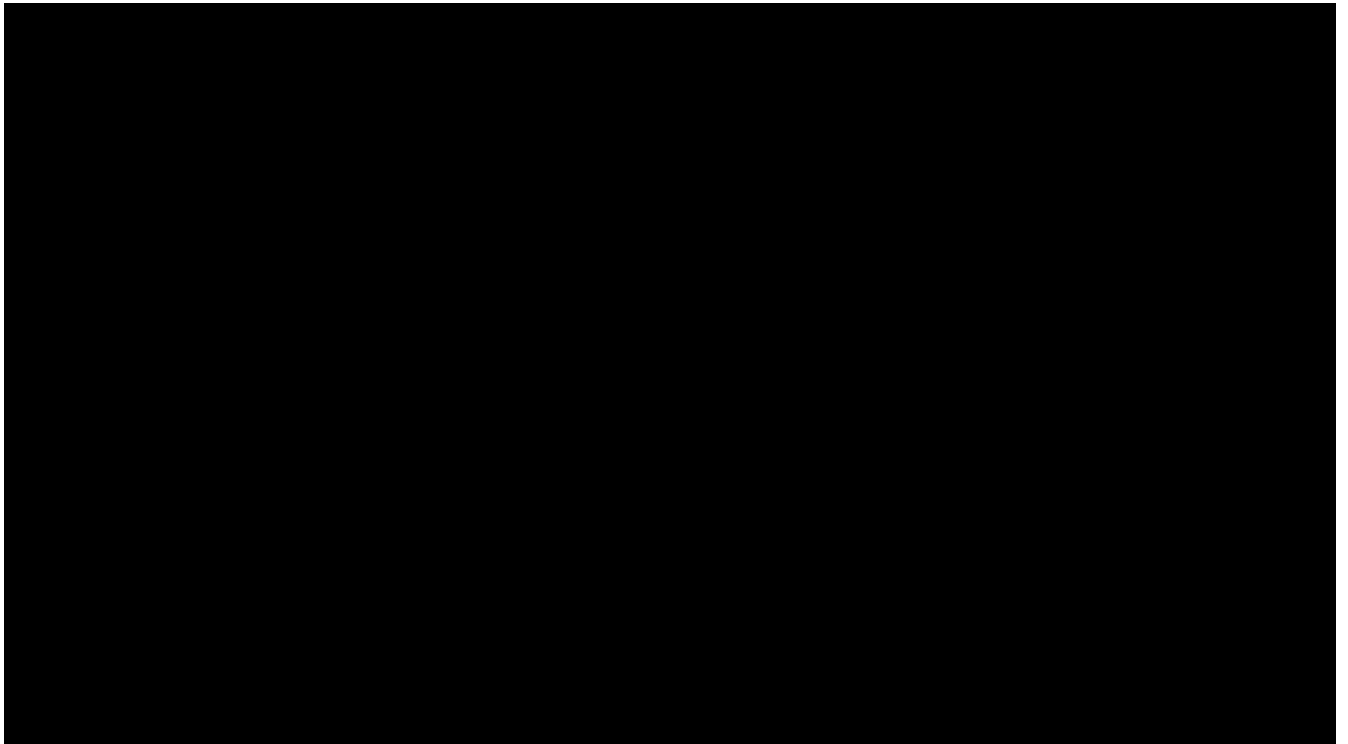
**By:** Sean Kirschenstein, Director

**Date:** November 14, 2023

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# **EXHIBIT G**



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## CERTIFIED TRANSLATION

### Description of Document(s):

<b>PROPOSAL FOR THE ADJUSTMENT OF GROUP STRUCTURE AND MANAGERIAL STAFF</b>
<b>IRI-SU-000415 - IRI-SU-000417</b>

Source Language: <b>CHINESE</b>	Target Language: <b>ENGLISH</b>
---------------------------------	---------------------------------

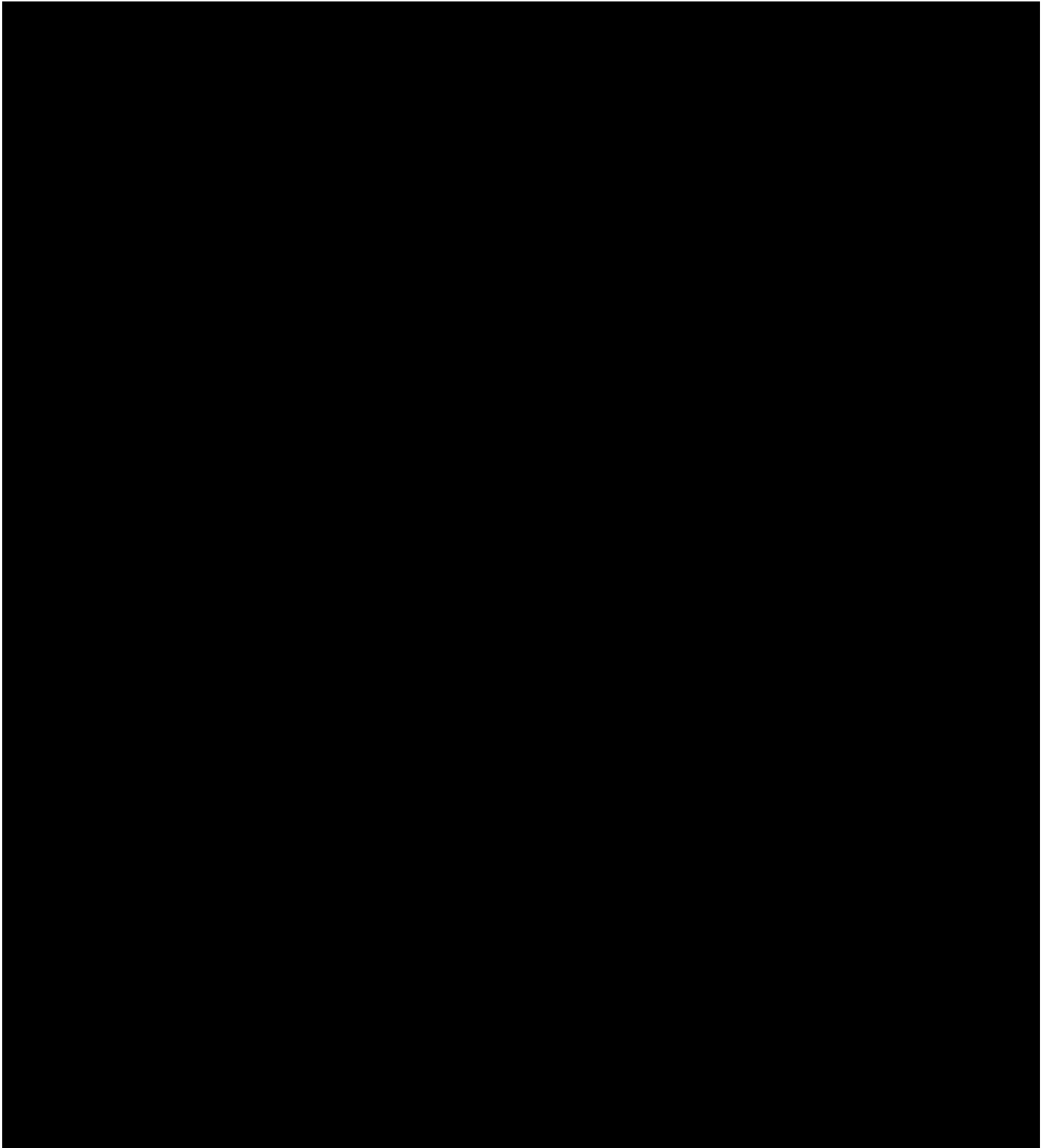
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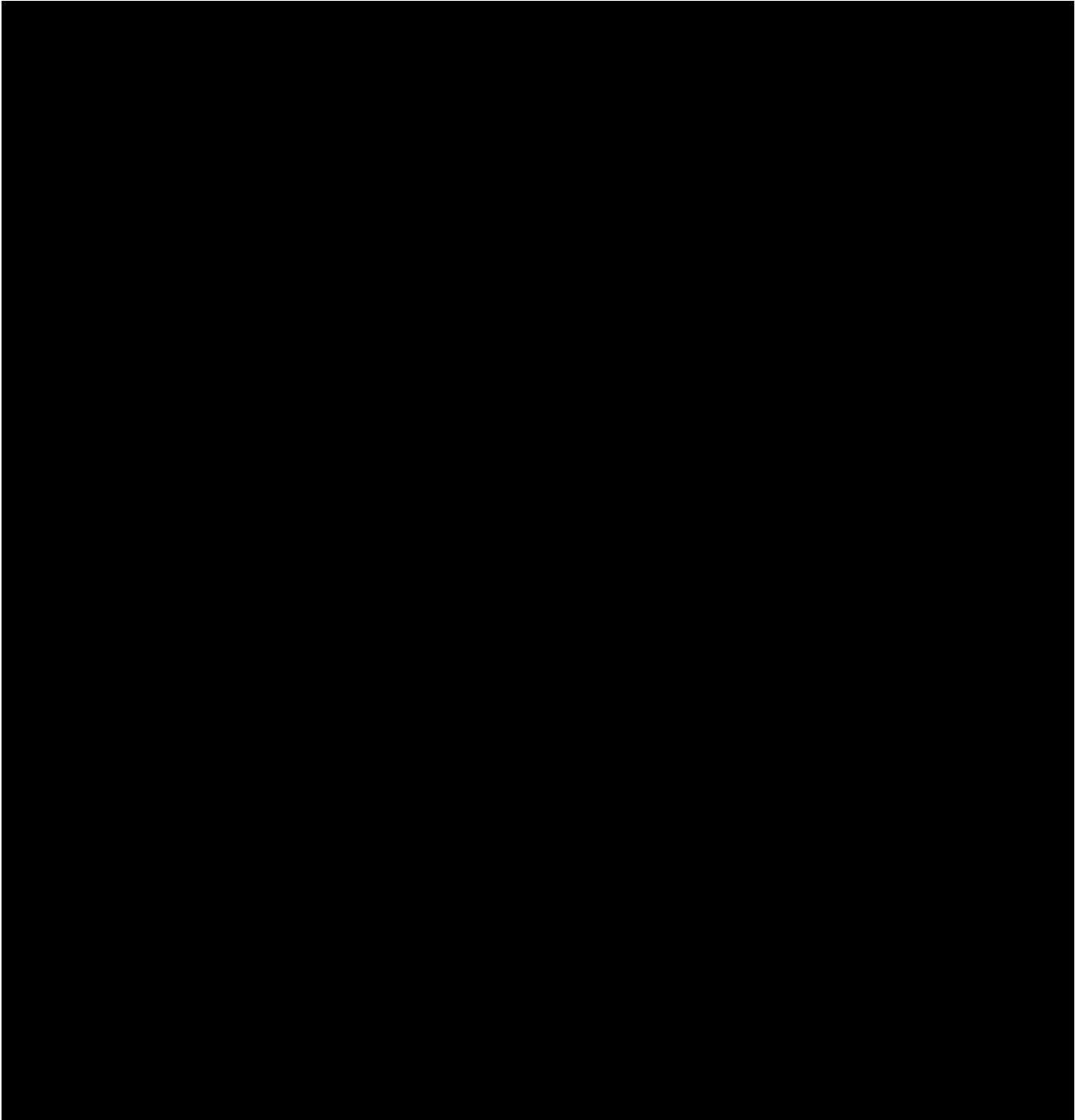
IN WITNESS WHEREOF, Language Fish LLC has caused the Certificate to be signed by its duly authorized officer(s).

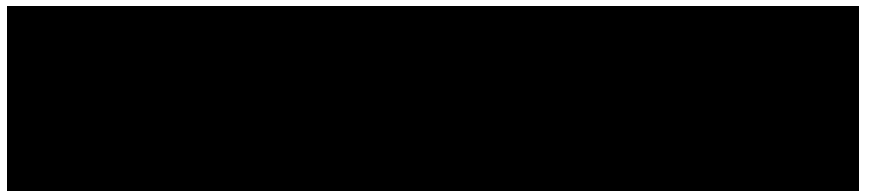
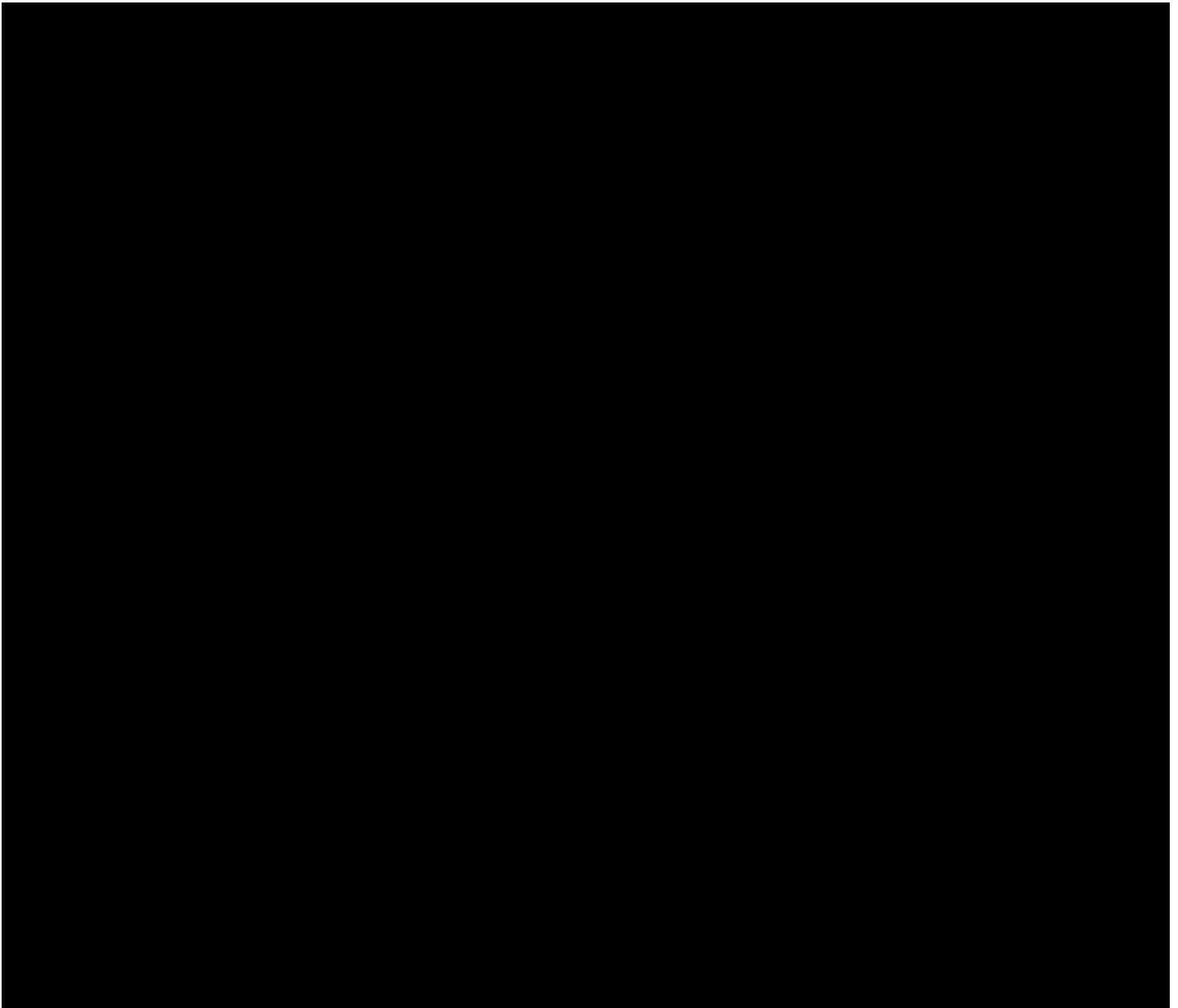
By: Sean Kirschenstein, Director

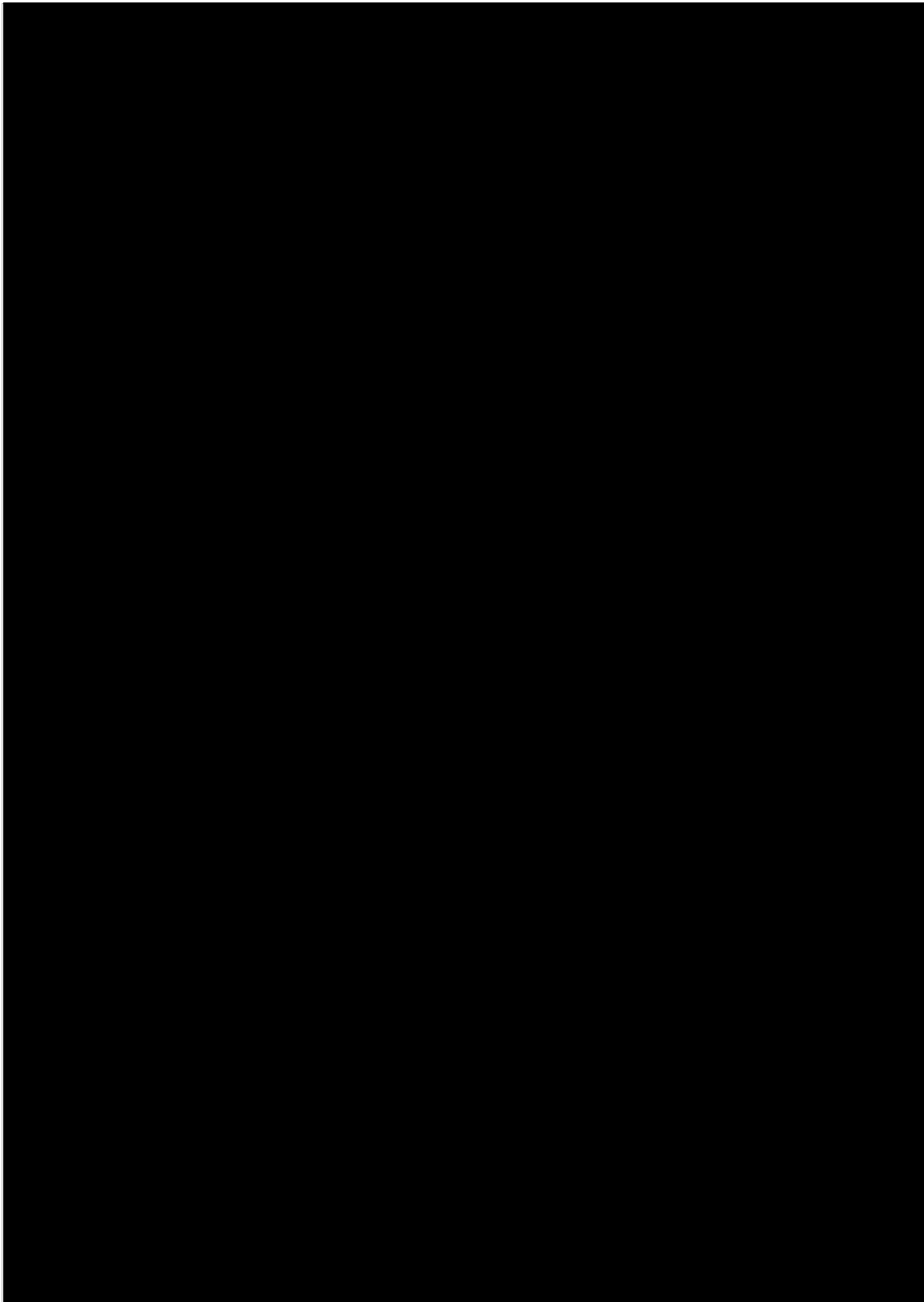
Date: November 14, 2023

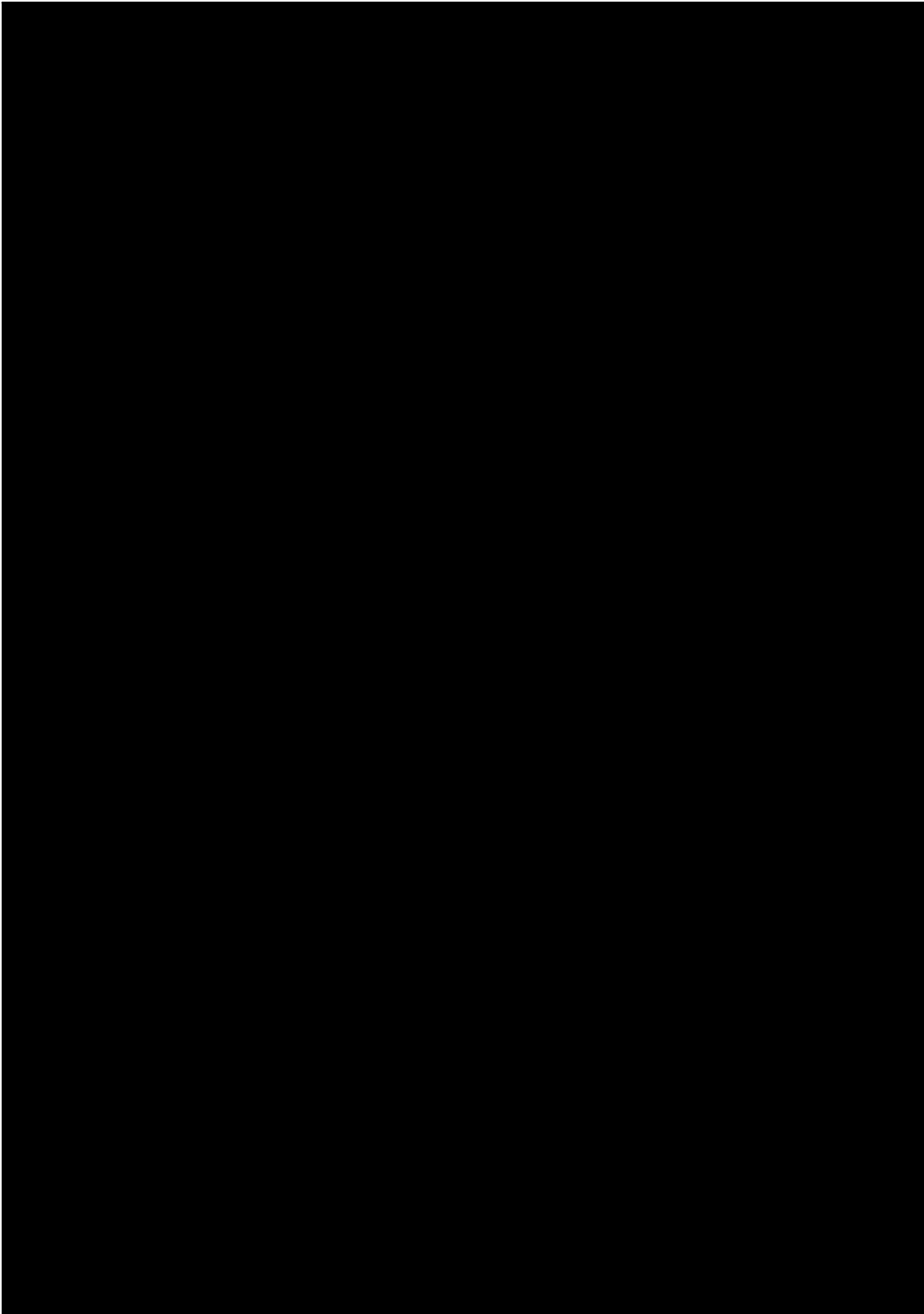
A copy of the translated version(s) is attached to this statement of certification.

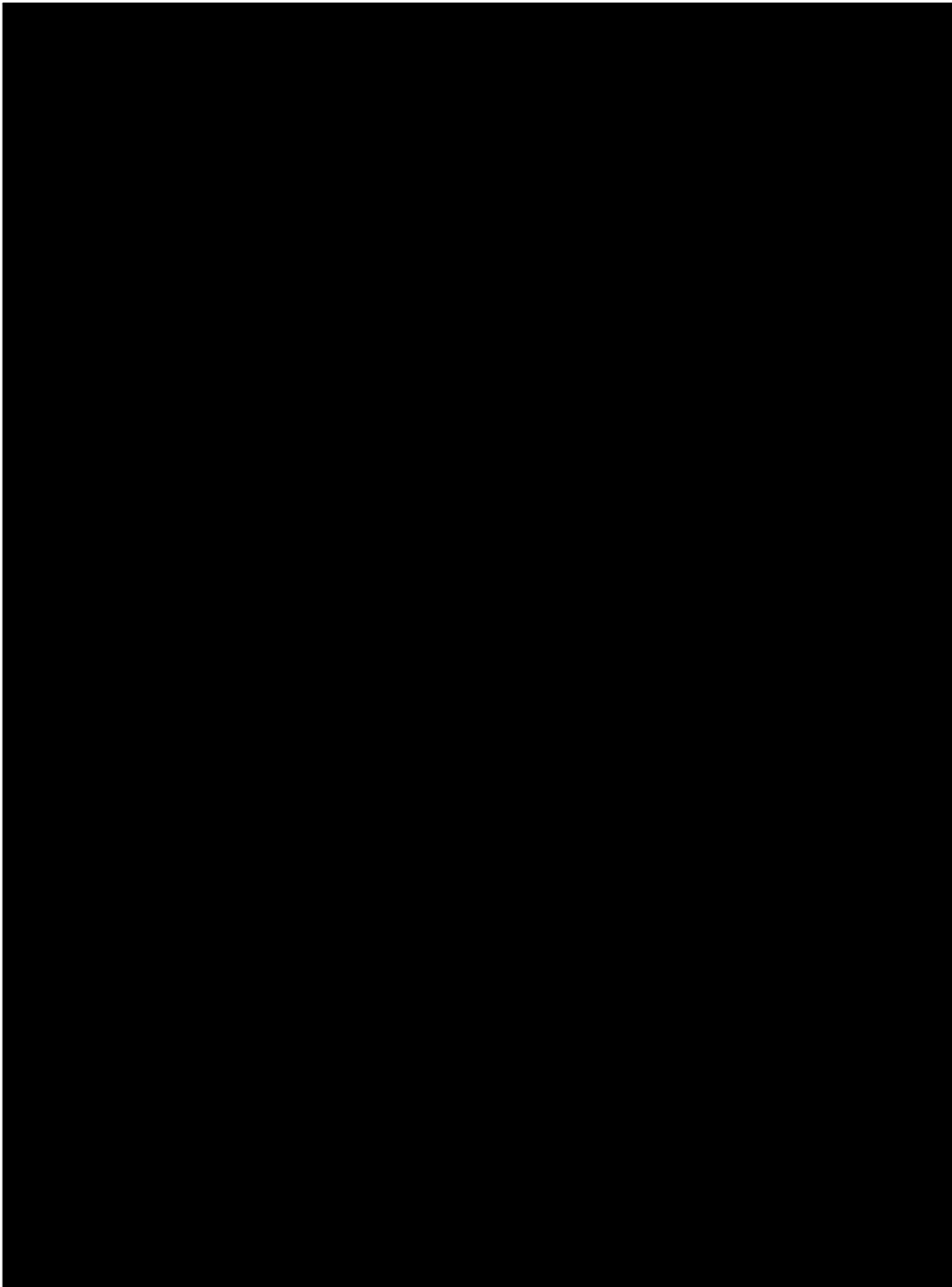














# **EXHIBIT H**



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## CERTIFIED TRANSLATION

### Description of Document(s):

<b>MEMO REGARDING THE RECOMMENDATION OF ZHANG JIMING</b>
<b>IRI-SU-000208</b>

Source Language: <b>CHINESE</b>	Target Language: <b>ENGLISH</b>
---------------------------------	---------------------------------

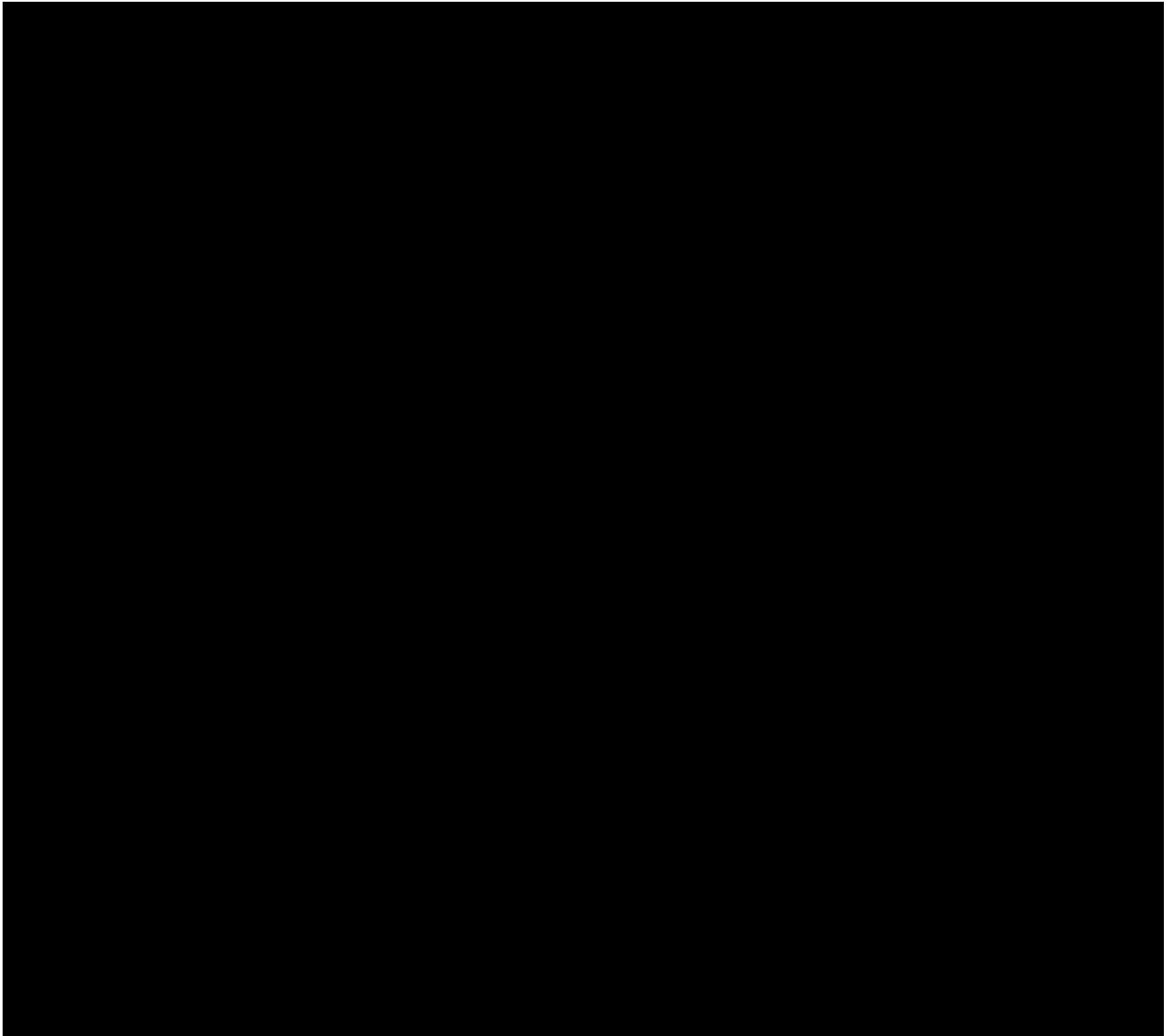
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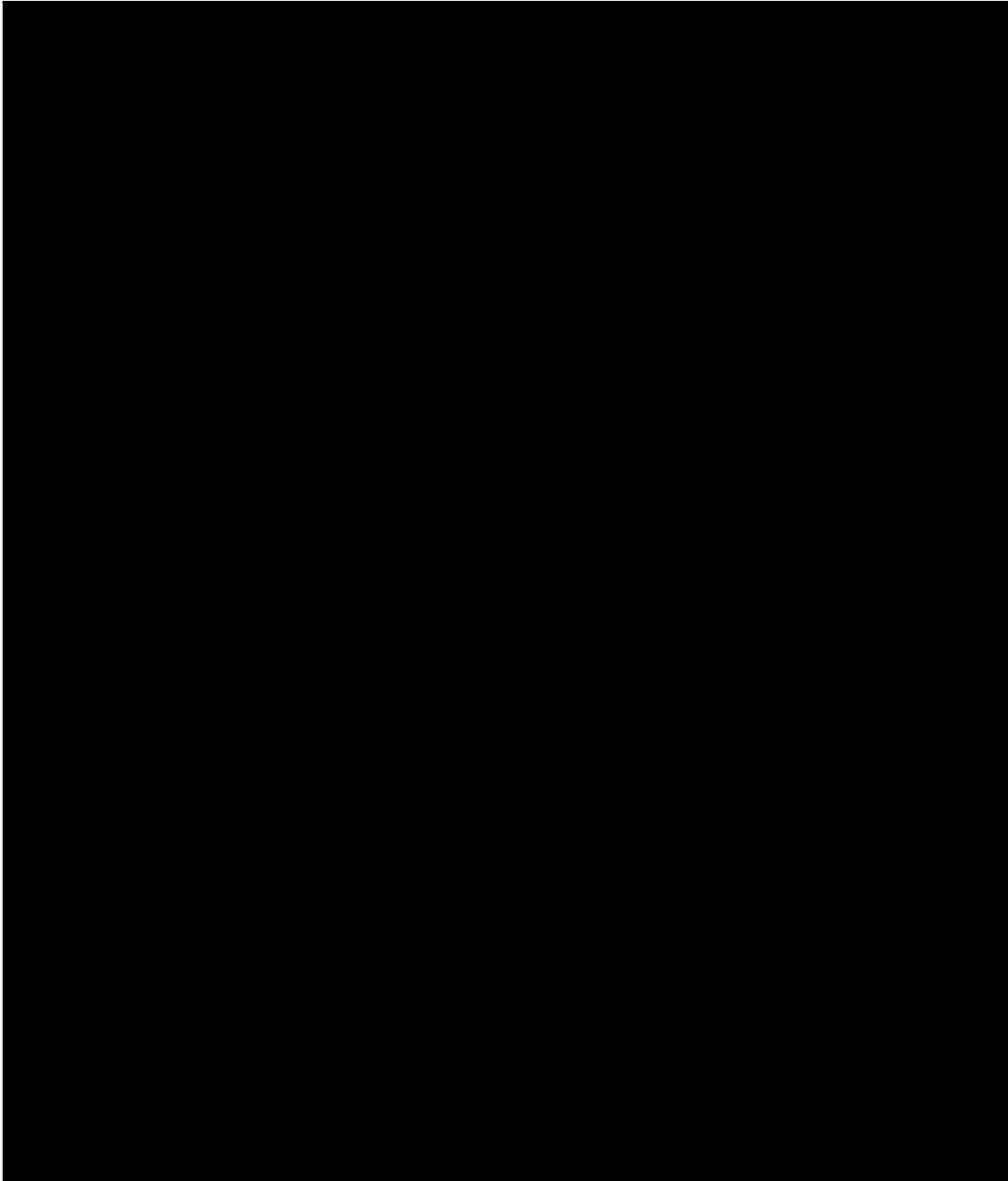
IN WITNESS WHEREOF, Language Fish LLC has caused the Certificate to be signed by its duly authorized officer(s).

**By:** Sean Kirschenstein, Director

**Date:** November 14, 2023

A copy of the translated version(s) is attached to this statement of certification.





# **EXHIBIT I**



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ATA Member Number: 248719

## CERTIFIED TRANSLATION

### Description of Document(s):

<b>SYSTEM COMMUNICATIONS / EXCEL SHEET</b>
<b>IRI-SU-001446</b>

Source Language: <b>CHINESE</b>	Target Language: <b>ENGLISH</b>
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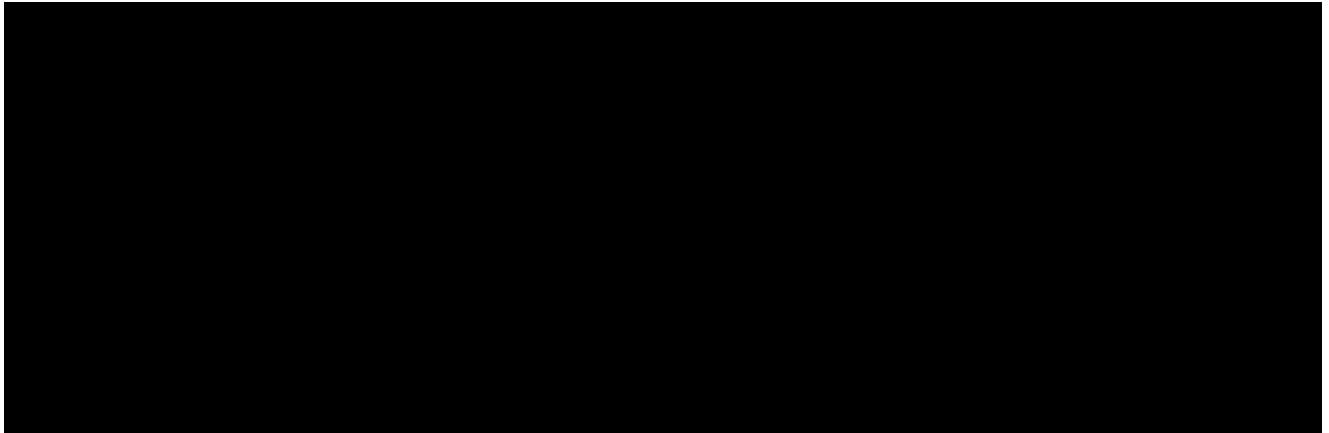
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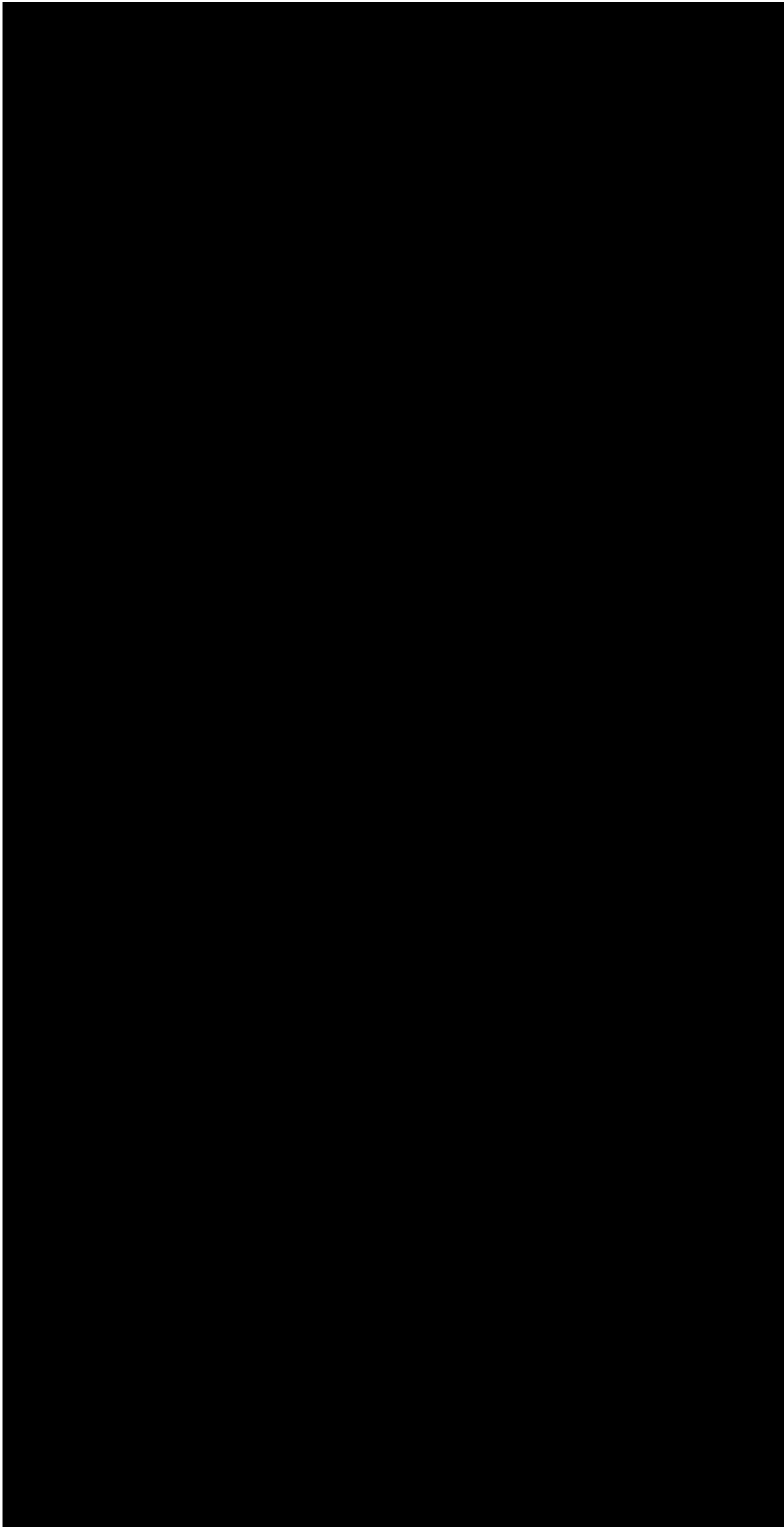
IN WITNESS WHEREOF, Language Fish LLC has caused the Certificate to be signed by its duly authorized officer(s).

**By:** Sean Kirschenstein, Director

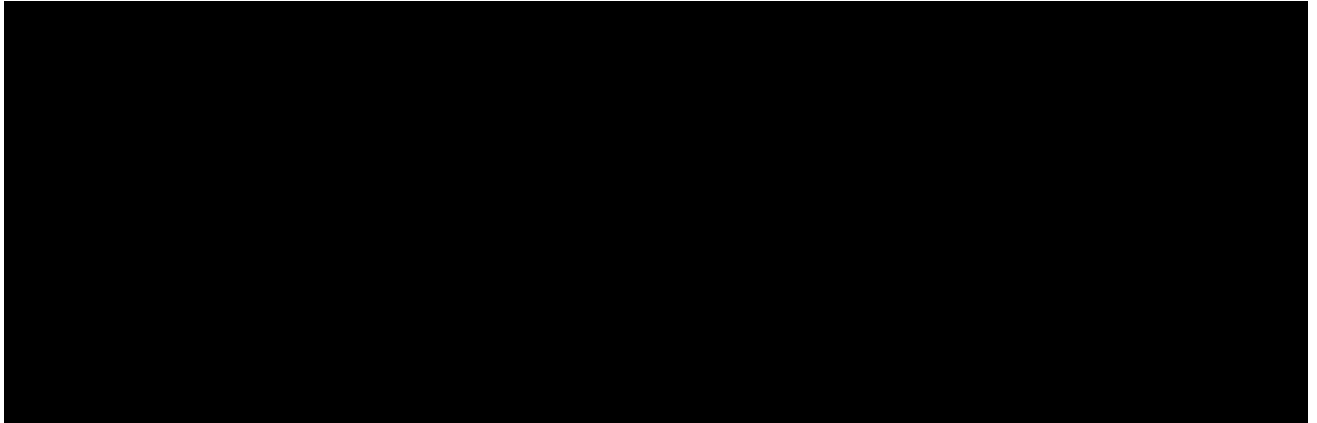
**Date:** November 14, 2023

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# **EXHIBIT J**



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## CERTIFIED TRANSLATION

### Description of Document(s):

<b>NOTICE ON THE DISTRIBUTION OF AWARDS AND HOLIDAY BONUSES</b>
<b>IRI-SU-000421 - IRI-SU-000423</b>

Source Language: <b>CHINESE</b>	Target Language: <b>ENGLISH</b>
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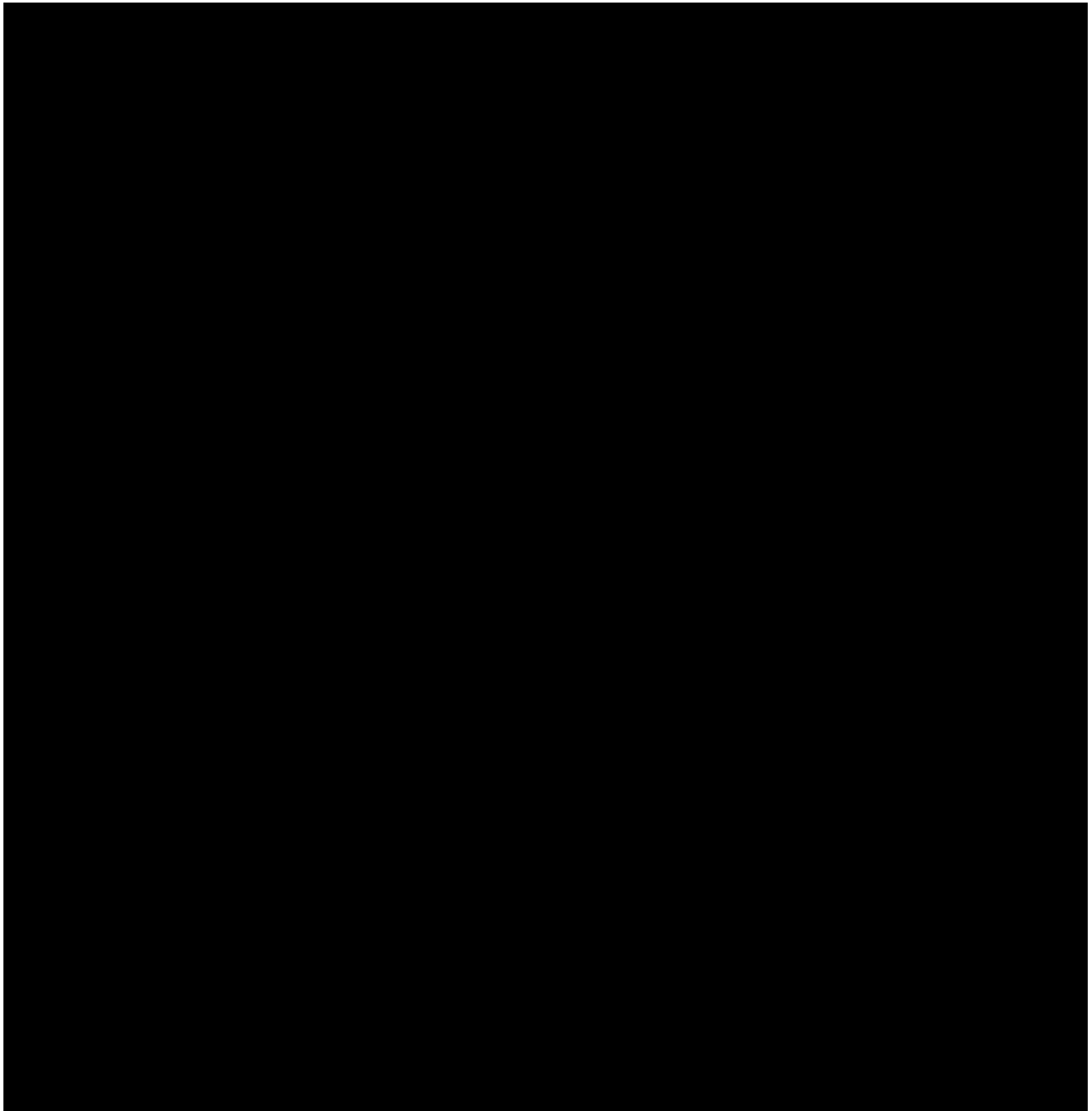
WITH REFERENCE TO THE ABOVE MENTIONED MATERIALS/DOCUMENTS, we at Language Fish LLC (doing business as www.certifiedtranslate.com), a professional document translation company, attest that the language translation completed by Language Fish's certified professional translators, represents, to the best of our judgment, an accurate and correct interpretation of the terminology/content of the source document(s). **This is to certify the correctness of the translation only.** We do not guarantee that the original is a genuine document or that the statements contained in the original document(s) are true.

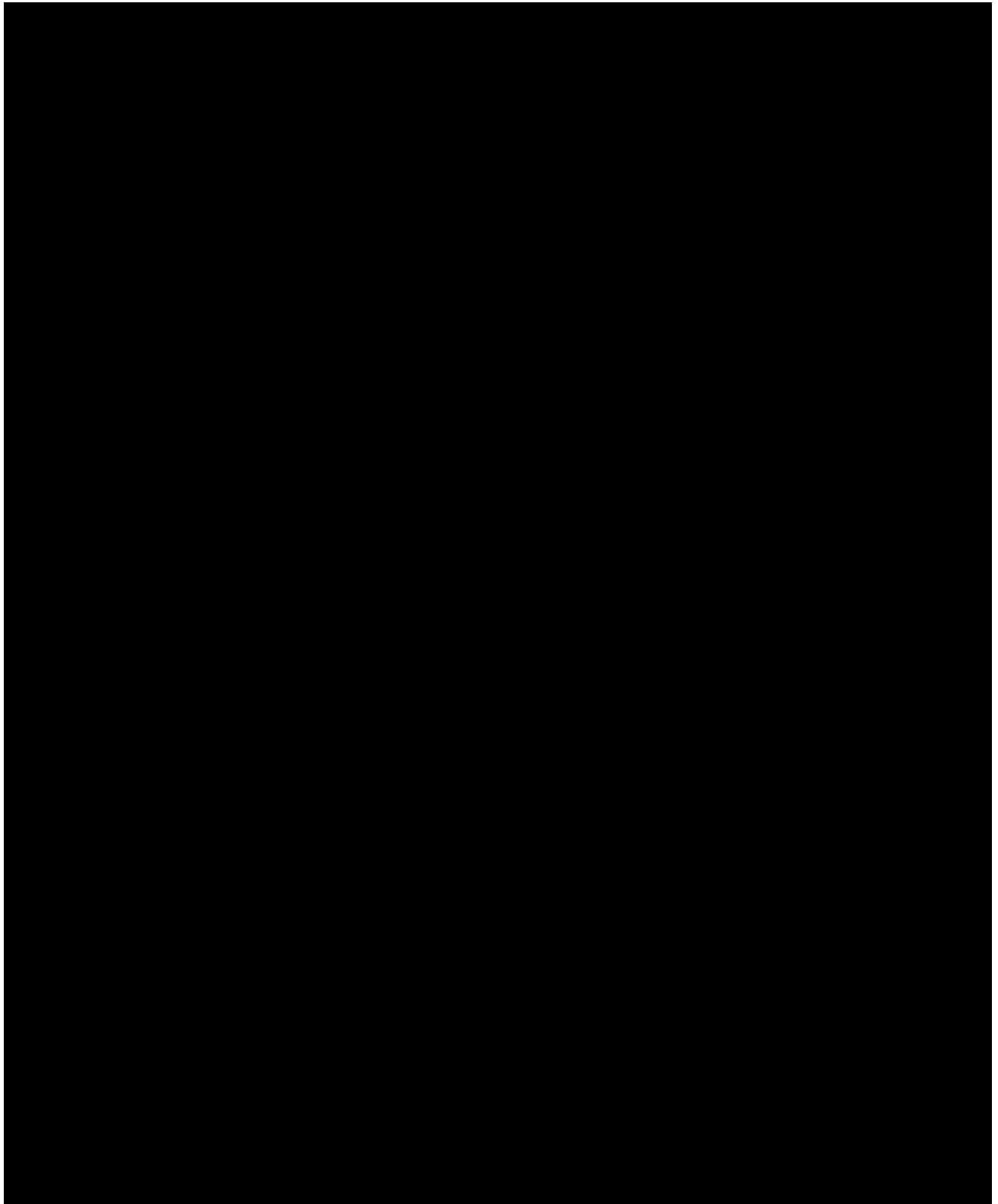
IN WITNESS WHEREOF, Language Fish LLC has caused the Certificate to be signed by its duly authorized officer(s).

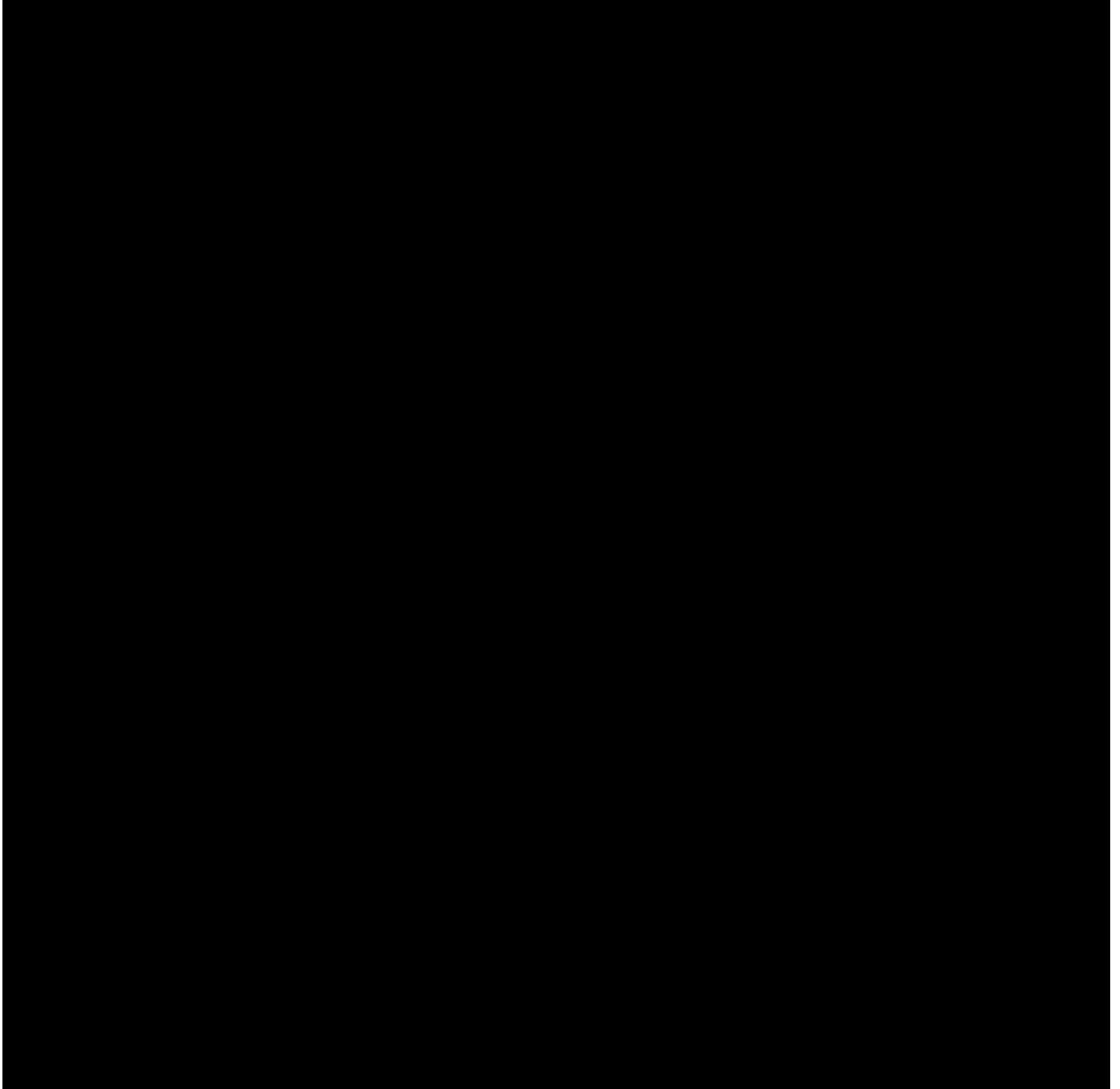
**By:** Sean Kirschenstein, Director

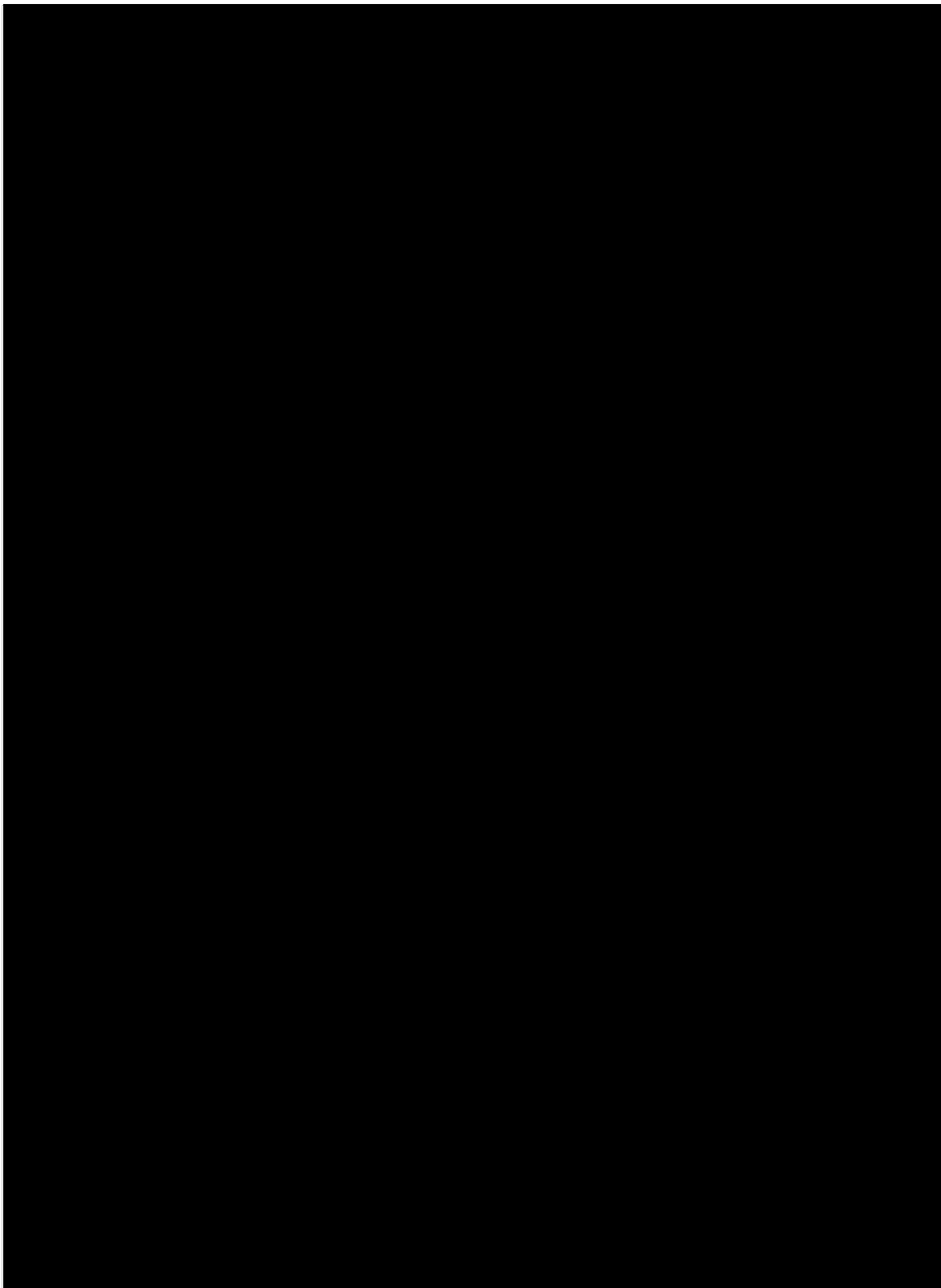
**Date:** November 14, 2023

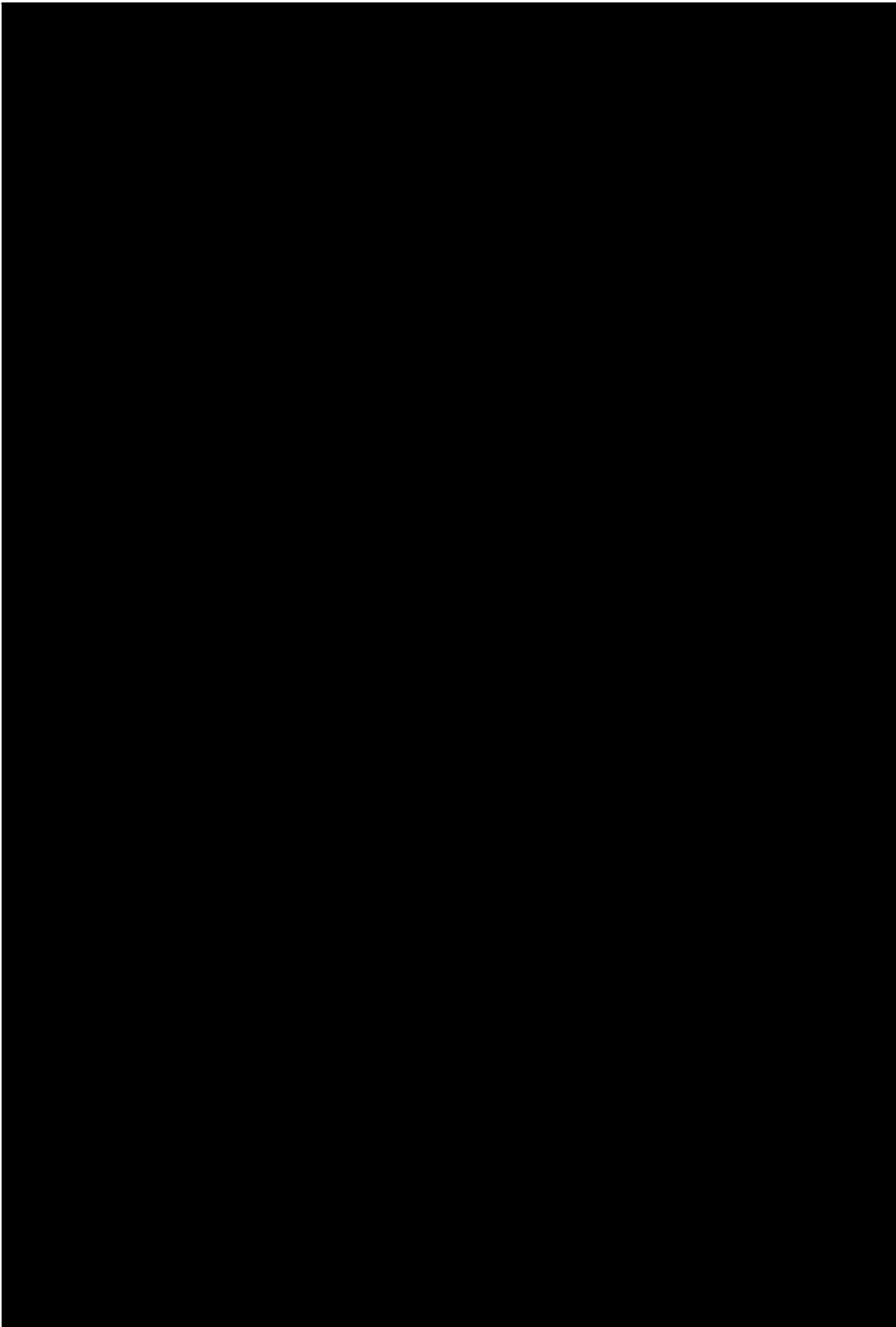
A copy of the translated version(s) is attached to this statement of certification.



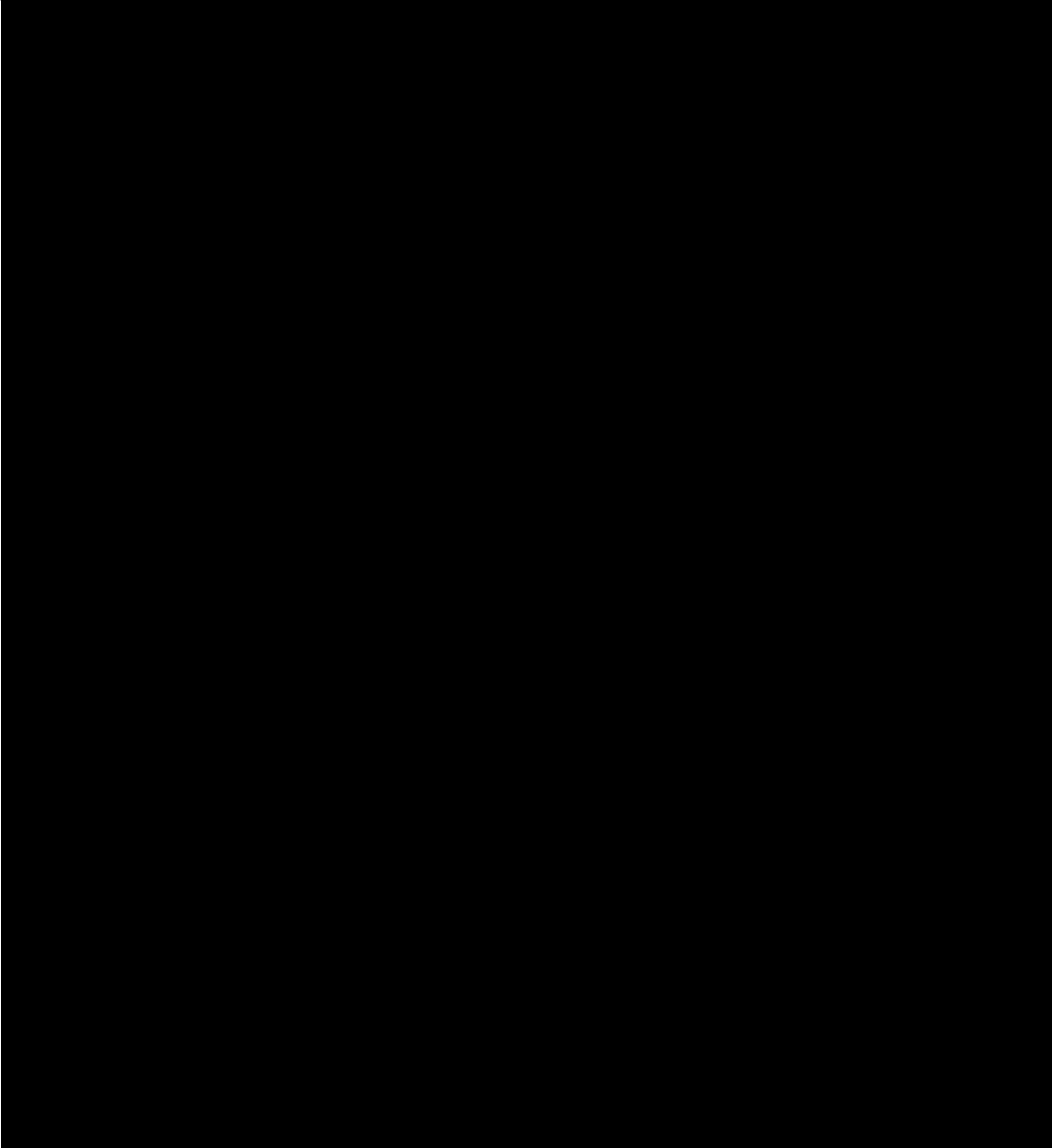












# **EXHIBIT K**



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fax +1-310-564-1944



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ATA Member Number: 248719

## CERTIFIED TRANSLATION

### Description of Document(s):

<b>SOUTH CHINA REGION – MID-LONG TERM CONTRACT WORKERS SALARY SHEET 1 FOR AUGUST 2023</b>
<b>IRI-SU-001467</b>

Source Language: <b>CHINESE</b>	Target Language: <b>ENGLISH</b>
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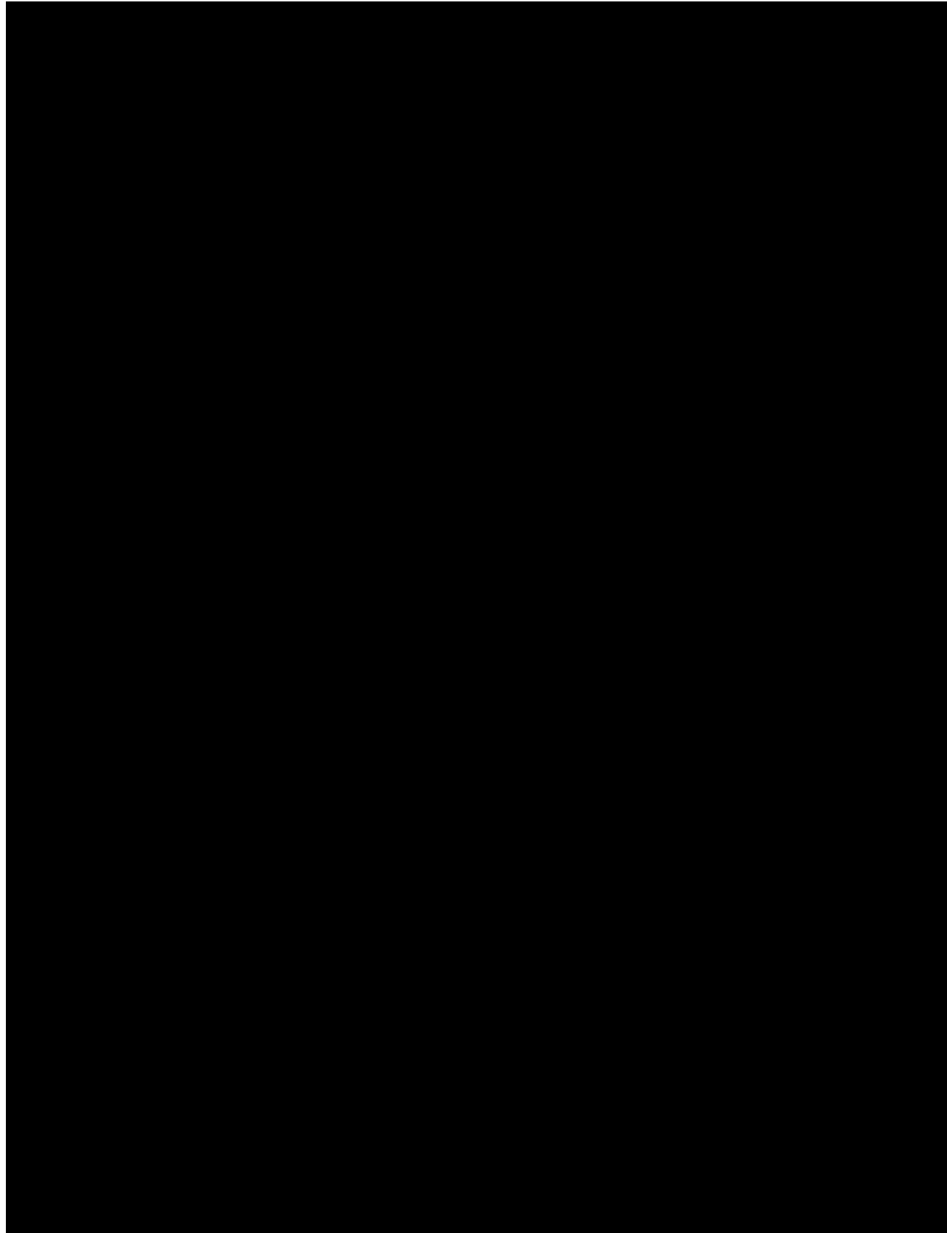
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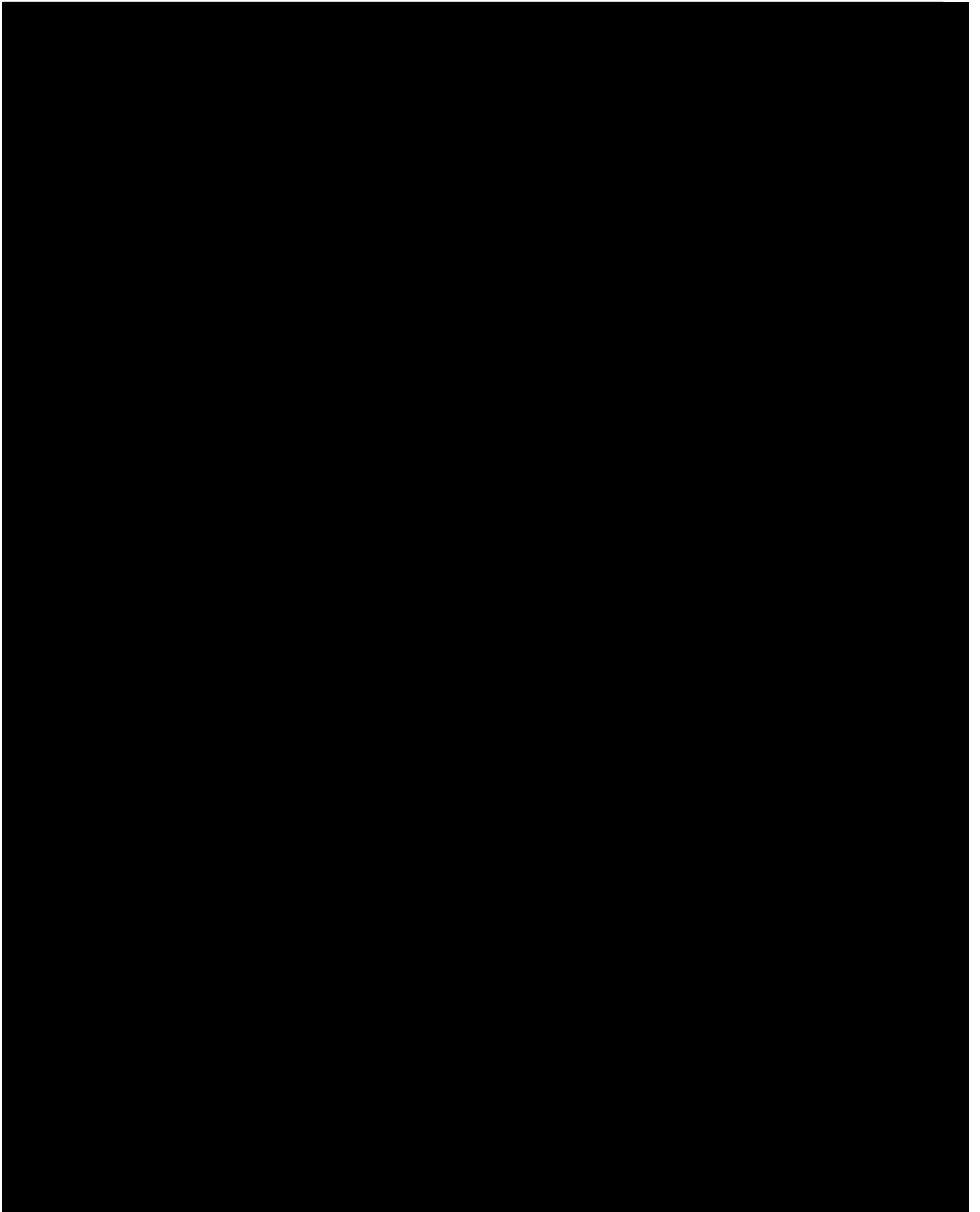
IN WITNESS WHEREOF, Language Fish LLC has caused the Certificate to be signed by its duly authorized officer(s).

**By:** Sean Kirschenstein, Director

**Date:** November 14, 2023

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# **EXHIBIT L**



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ATA Member Number: 248719

## CERTIFIED TRANSLATION

### Description of Document(s):

<b>MONTHLY REPORT ON THE EXECUTION OF THE TOTAL SALARY BUDGET</b>
<b>FOR THE YEAR 2022 (JULY TAB)</b>
<b>IRI-SU-000845</b>

Source Language: <b>CHINESE</b>	Target Language: <b>ENGLISH</b>
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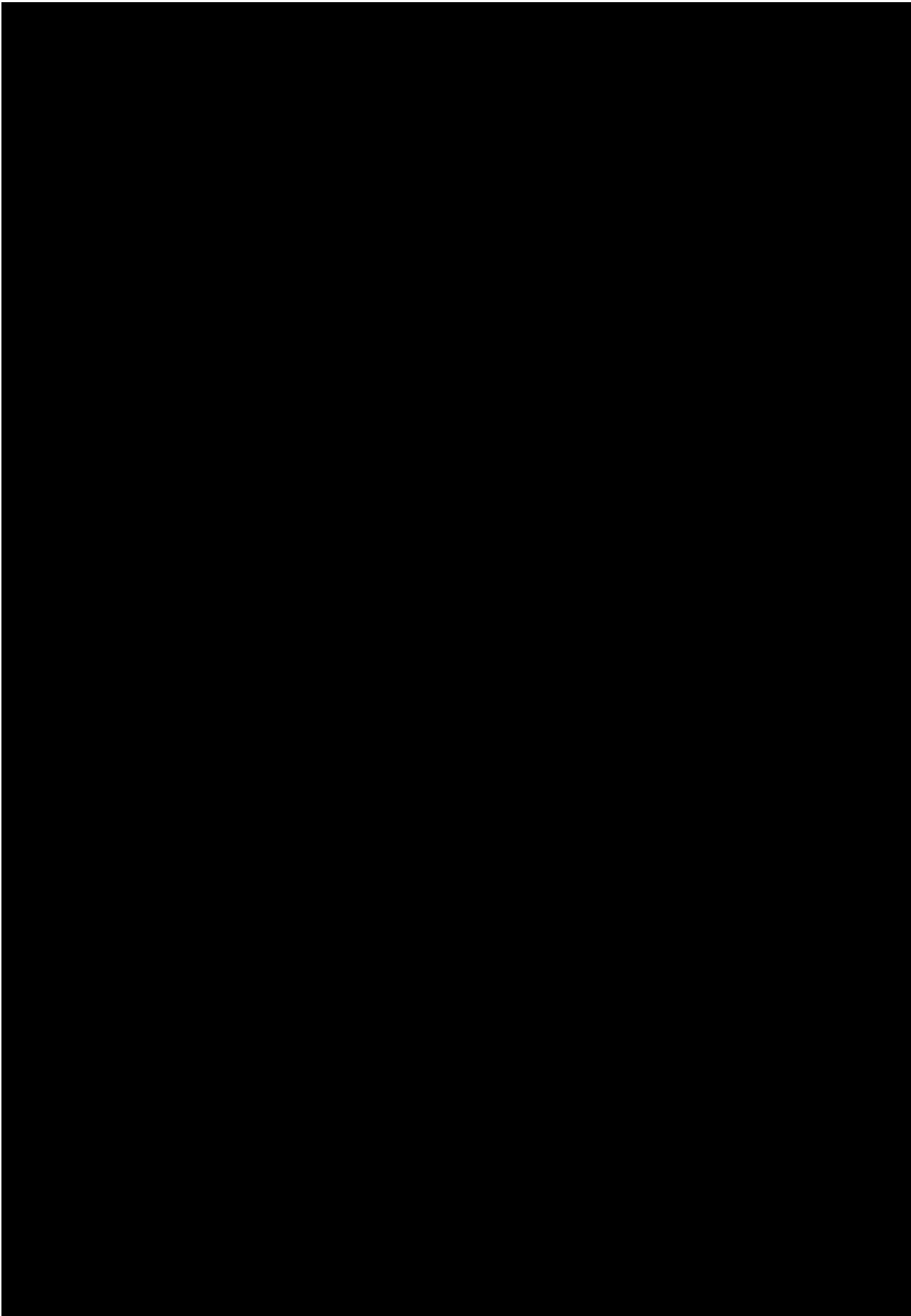
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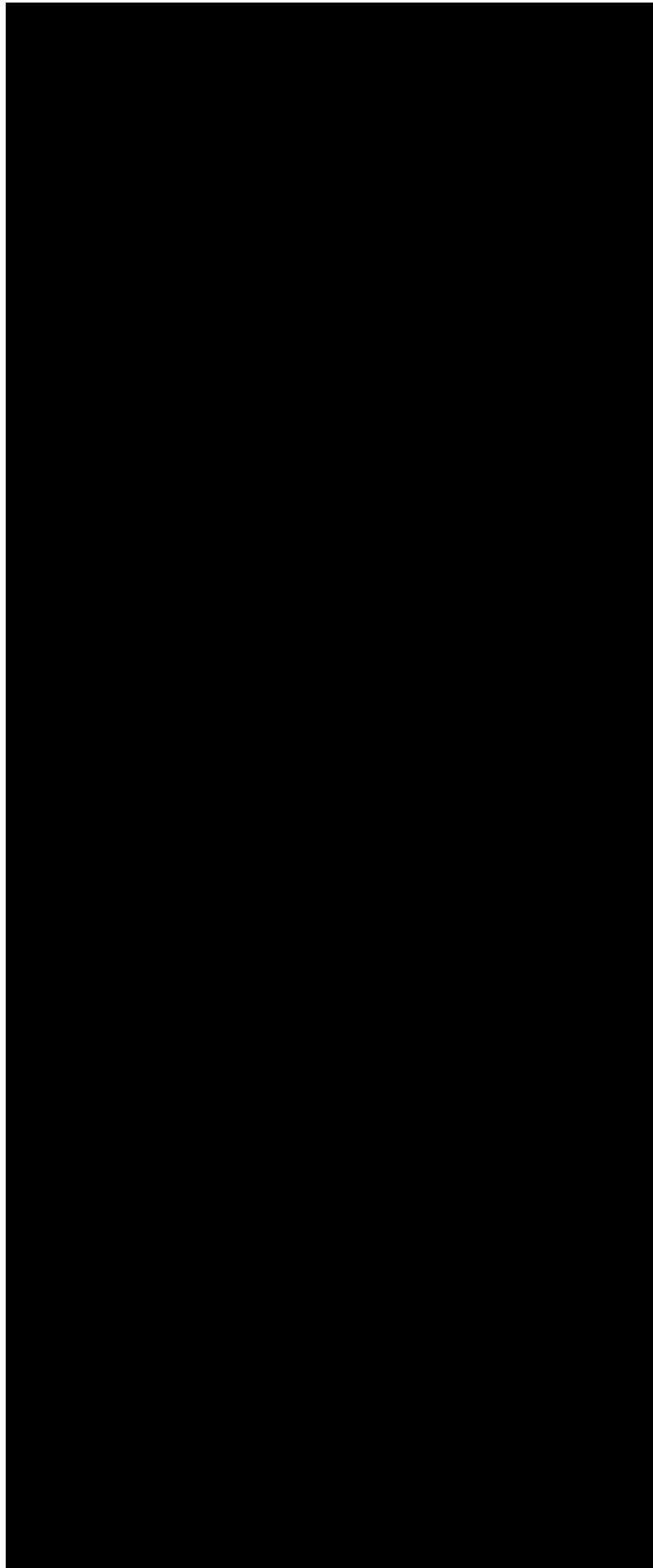
**By:** Sean Kirschenstein, Director

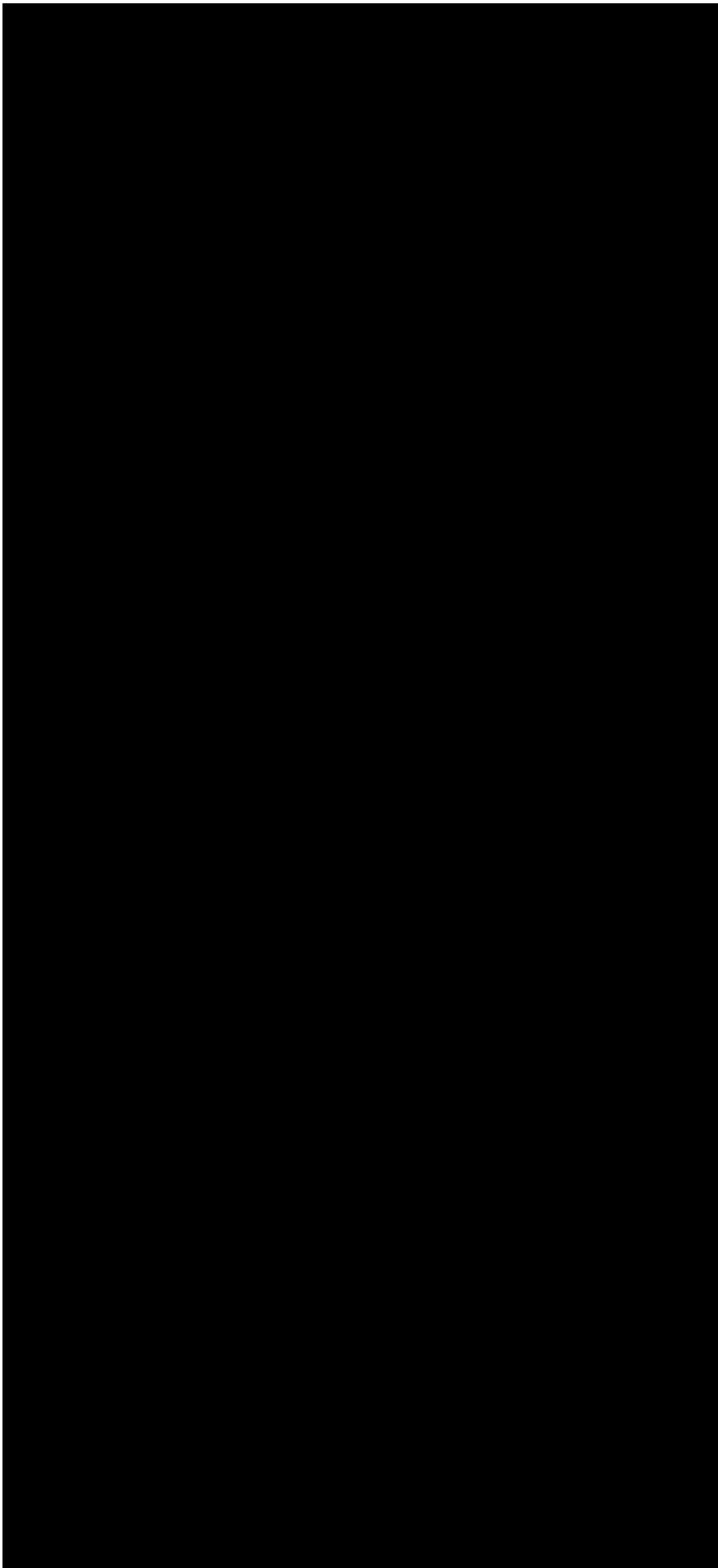
**Date:** November 14, 2023

A copy of the translated version(s) is attached to this statement of certification.









# **EXHIBIT M**



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## CERTIFIED TRANSLATION

### Description of Document(s):

<b>SYSTEM COMMUNICATIONS / EXCEL SHEET</b>
<b>IRI-SU-001344</b>

Source Language: <b>CHINESE</b>	Target Language: <b>ENGLISH</b>
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IN WITNESS WHEREOF, Language Fish LLC has caused the Certificate to be signed by its duly authorized officer(s).

**By:** Sean Kirschenstein, Director

**Date:** November 14, 2023

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# **EXHIBIT N**





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## CERTIFIED TRANSLATION

### Description of Document(s):

<b>REQUEST FOR COMMENTS ON AUDIT REPORT (EXCERPT)</b>
<b>IRI-SU-000190, IRI-SU-000197, IRI-SU-000198</b>

Source Language: <b>CHINESE</b>	Target Language: <b>ENGLISH</b>
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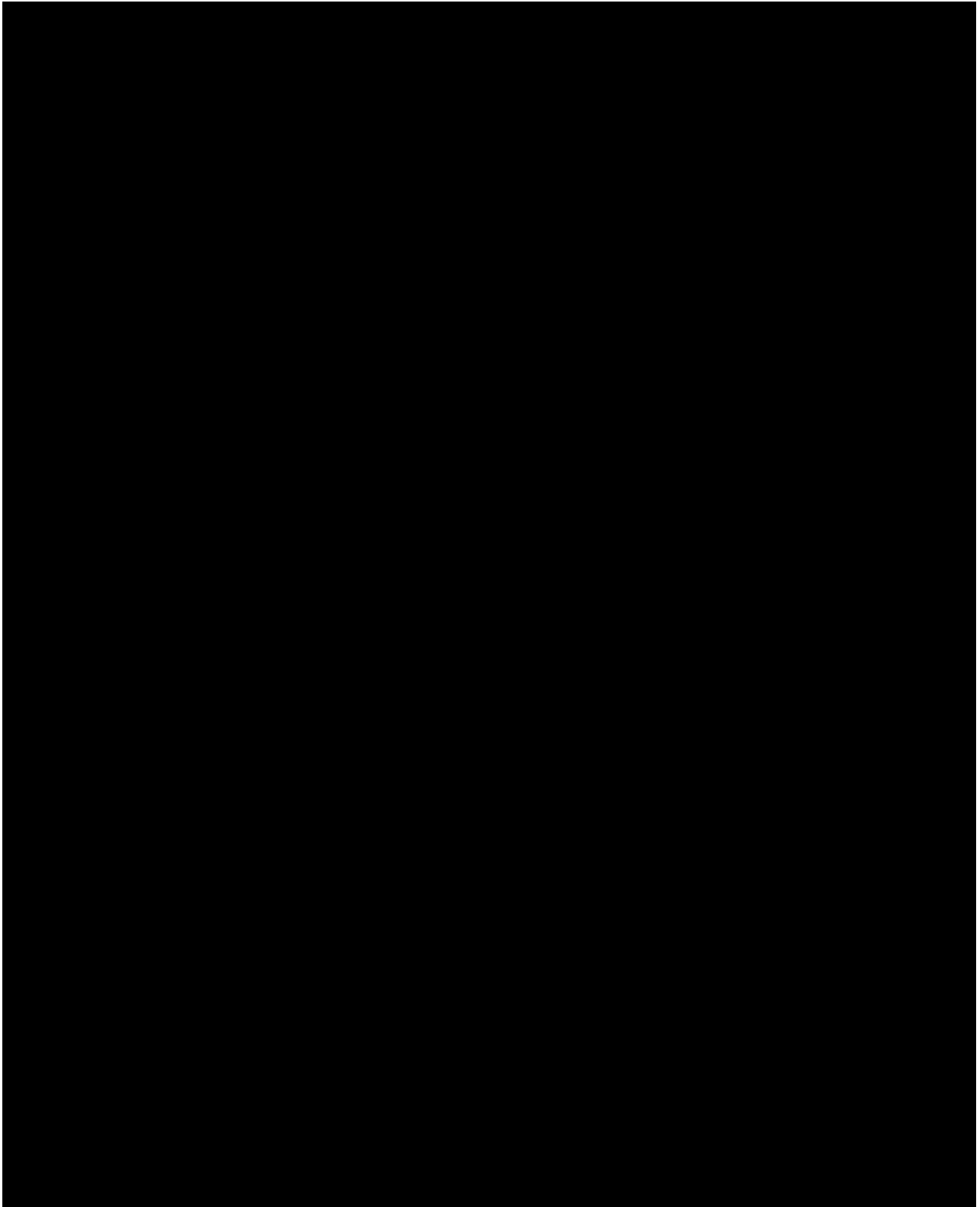
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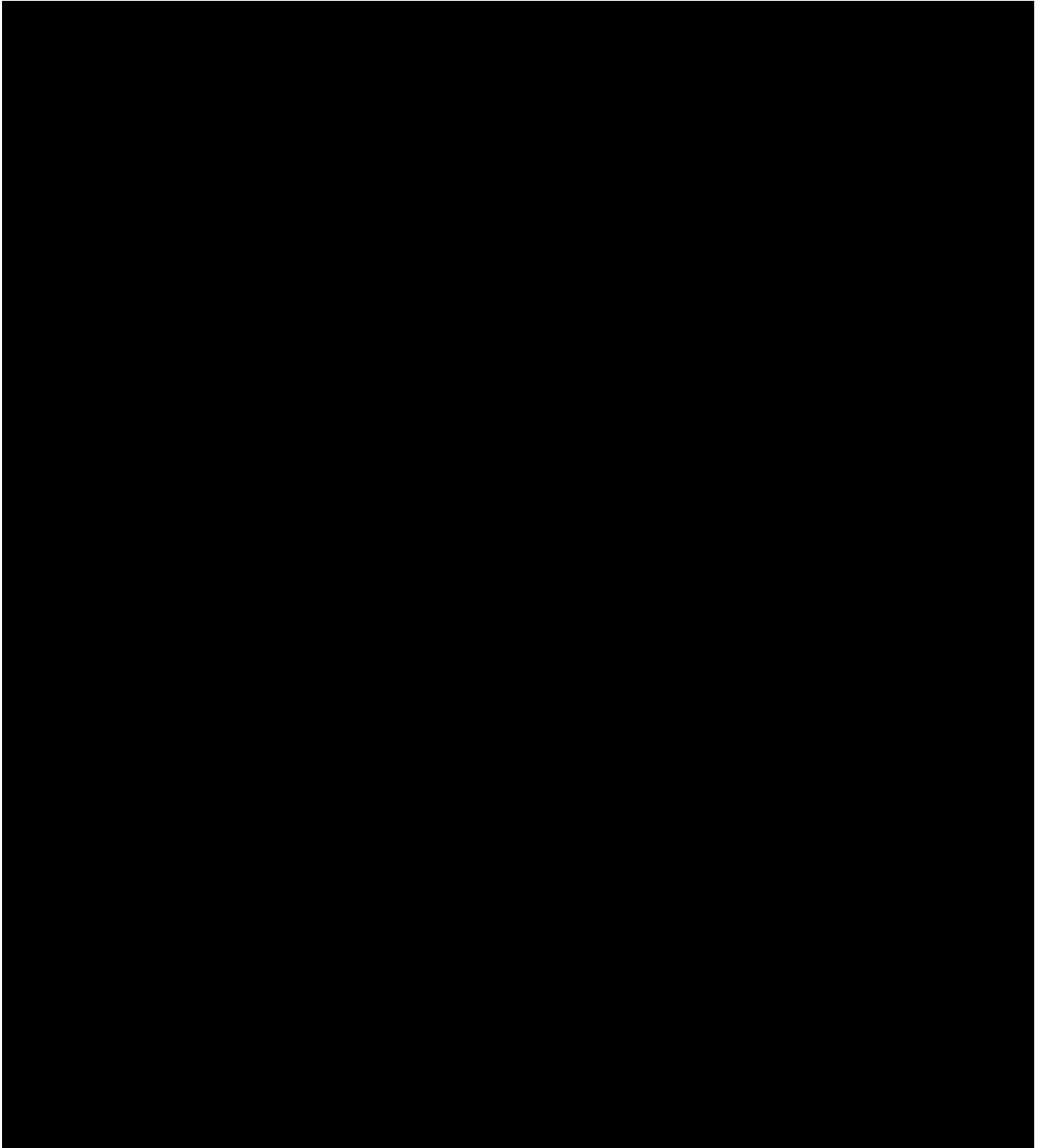
IN WITNESS WHEREOF, Language Fish LLC has caused the Certificate to be signed by its duly authorized officer(s).

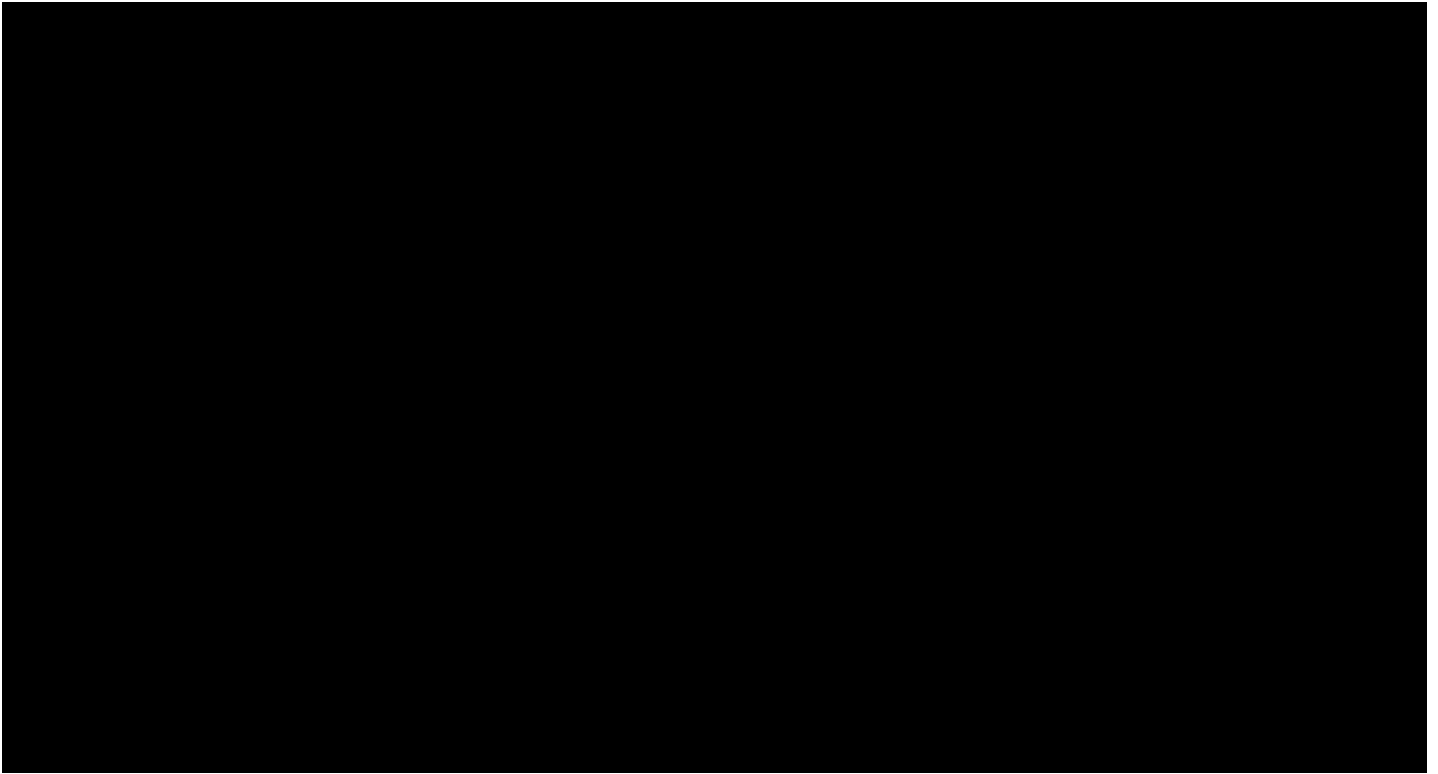
**By:** Sean Kirschenstein, Director

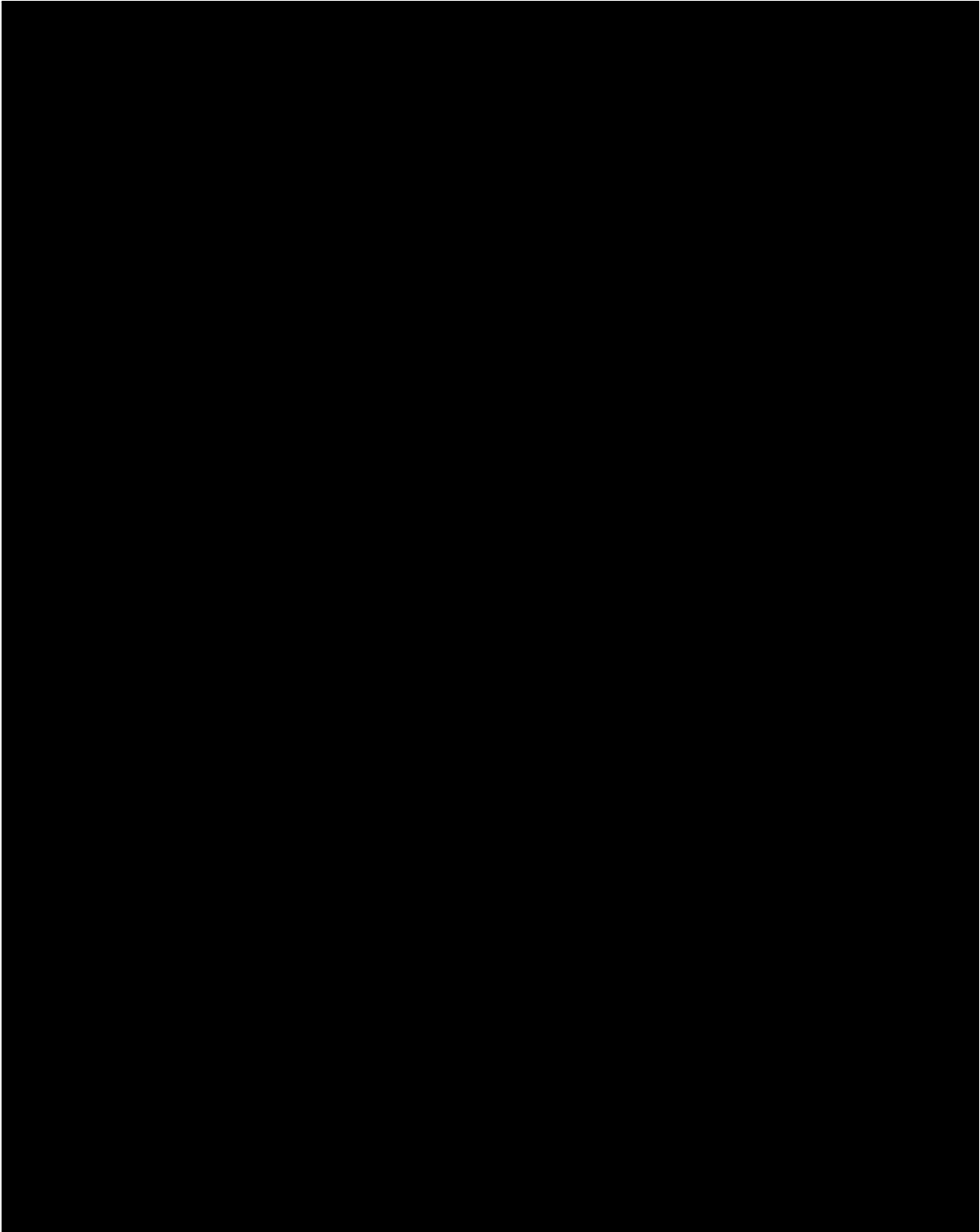
**Date:** November 14, 2023

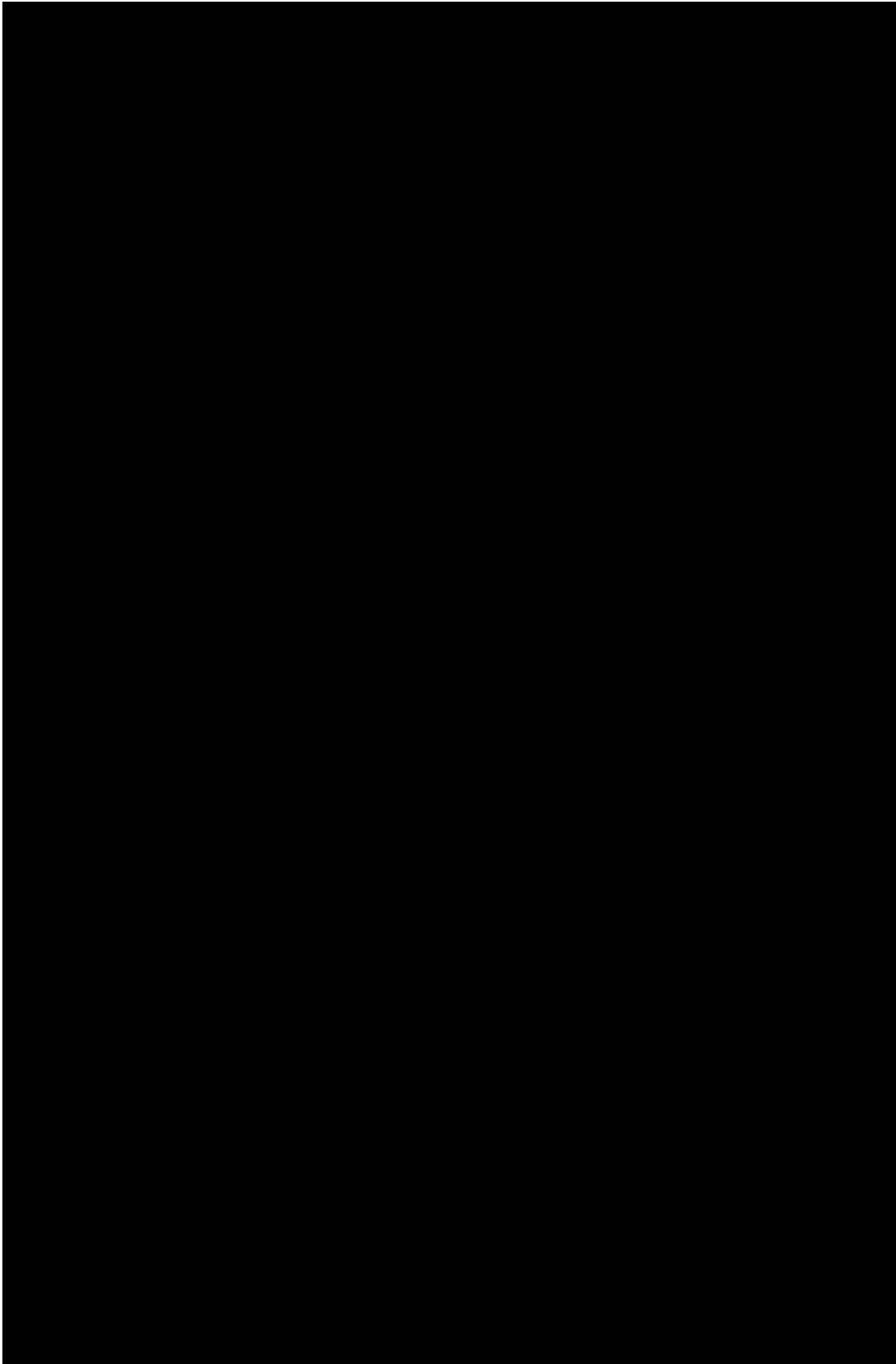
A copy of the translated version(s) is attached to this statement of certification.

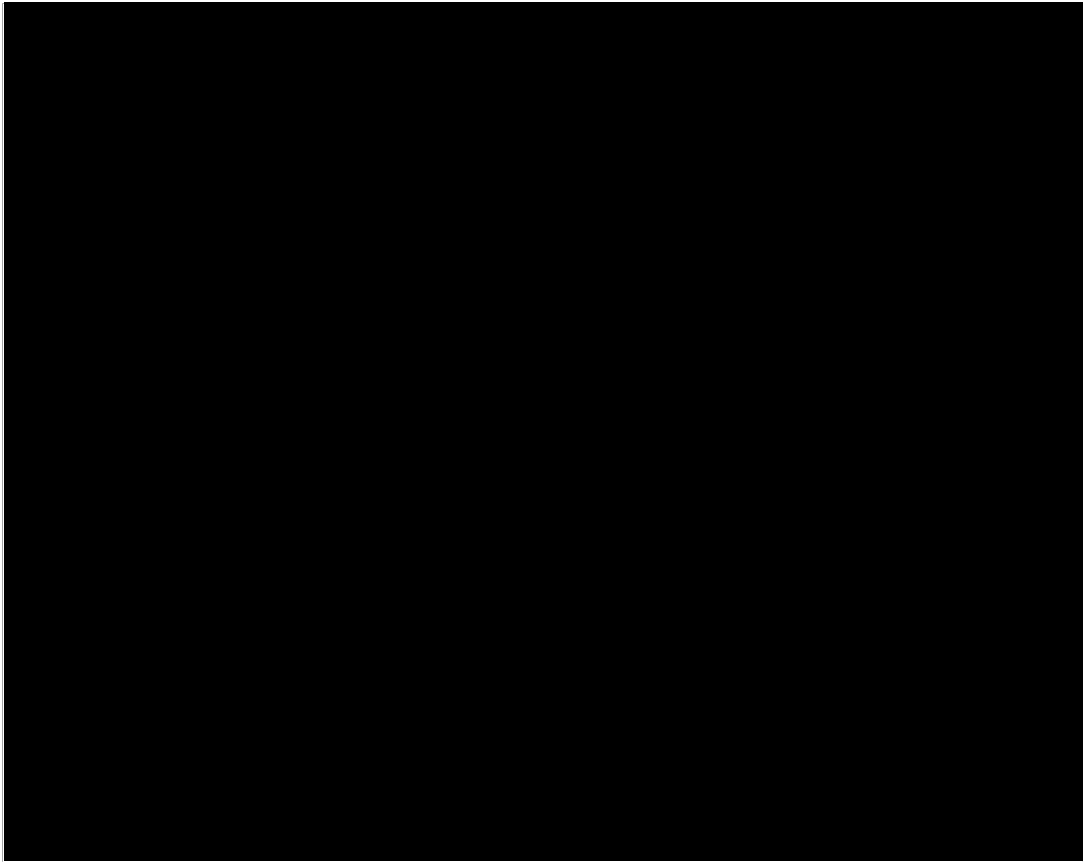












# **EXHIBIT O**





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ATA Member Number: 248719

## CERTIFIED TRANSLATION

### Description of Document(s):

<b>CHAT MESSAGES</b>
<b>IRI-SU-000199, IRI-SU-000165</b>

Source Language: <b>CHINESE</b>	Target Language: <b>ENGLISH</b>
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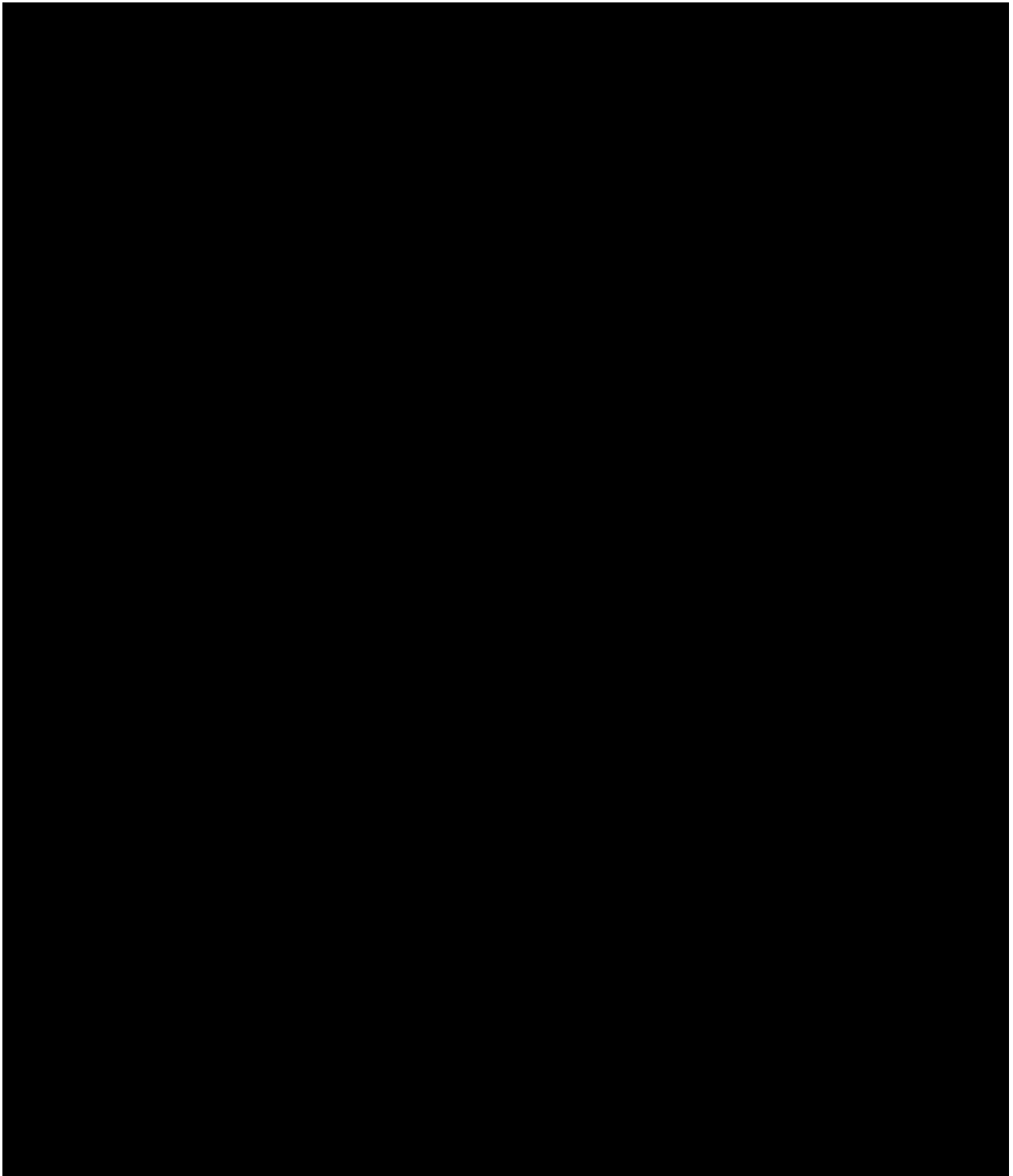
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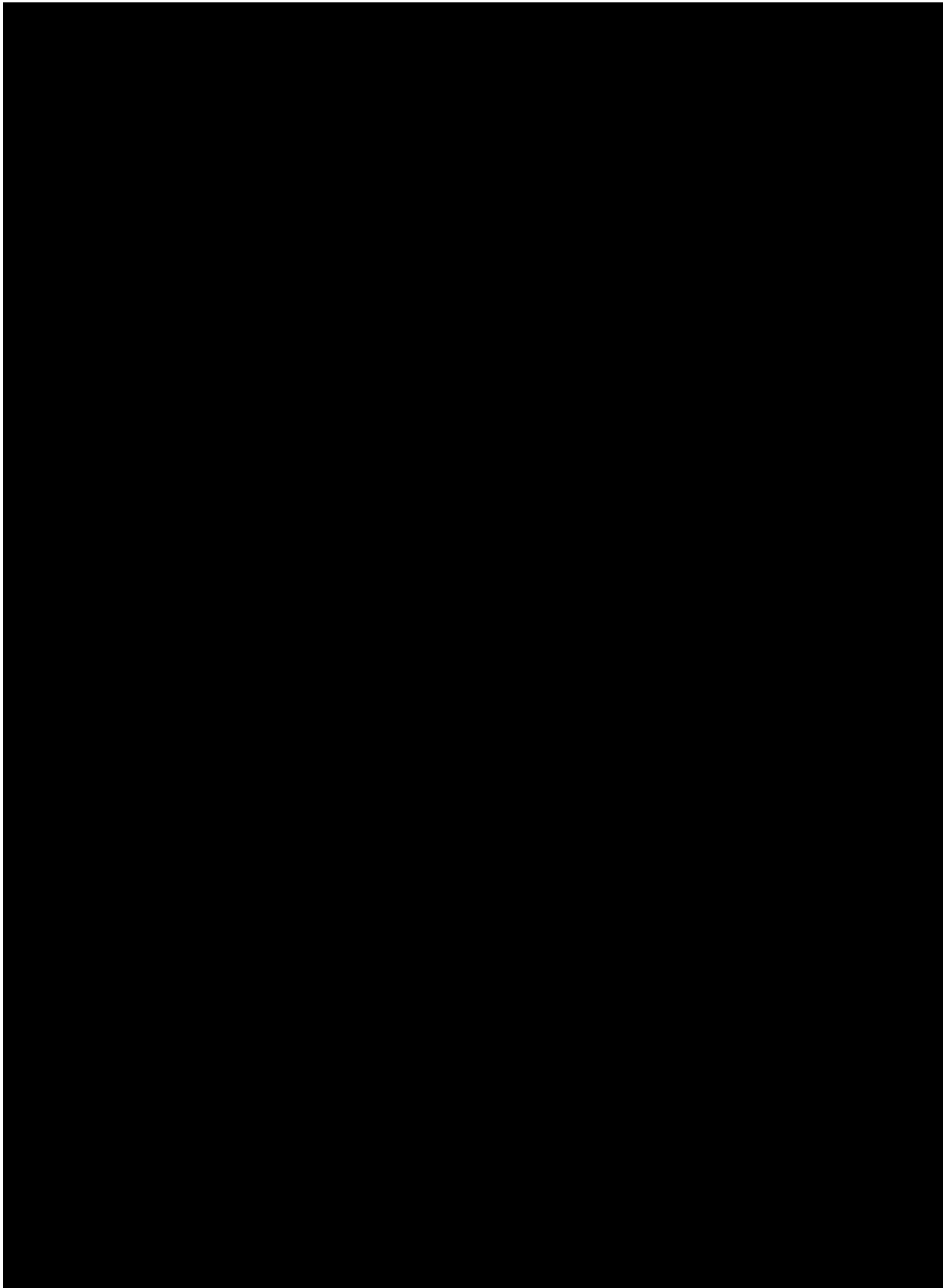
IN WITNESS WHEREOF, Language Fish LLC has caused the Certificate to be signed by its duly authorized officer(s).

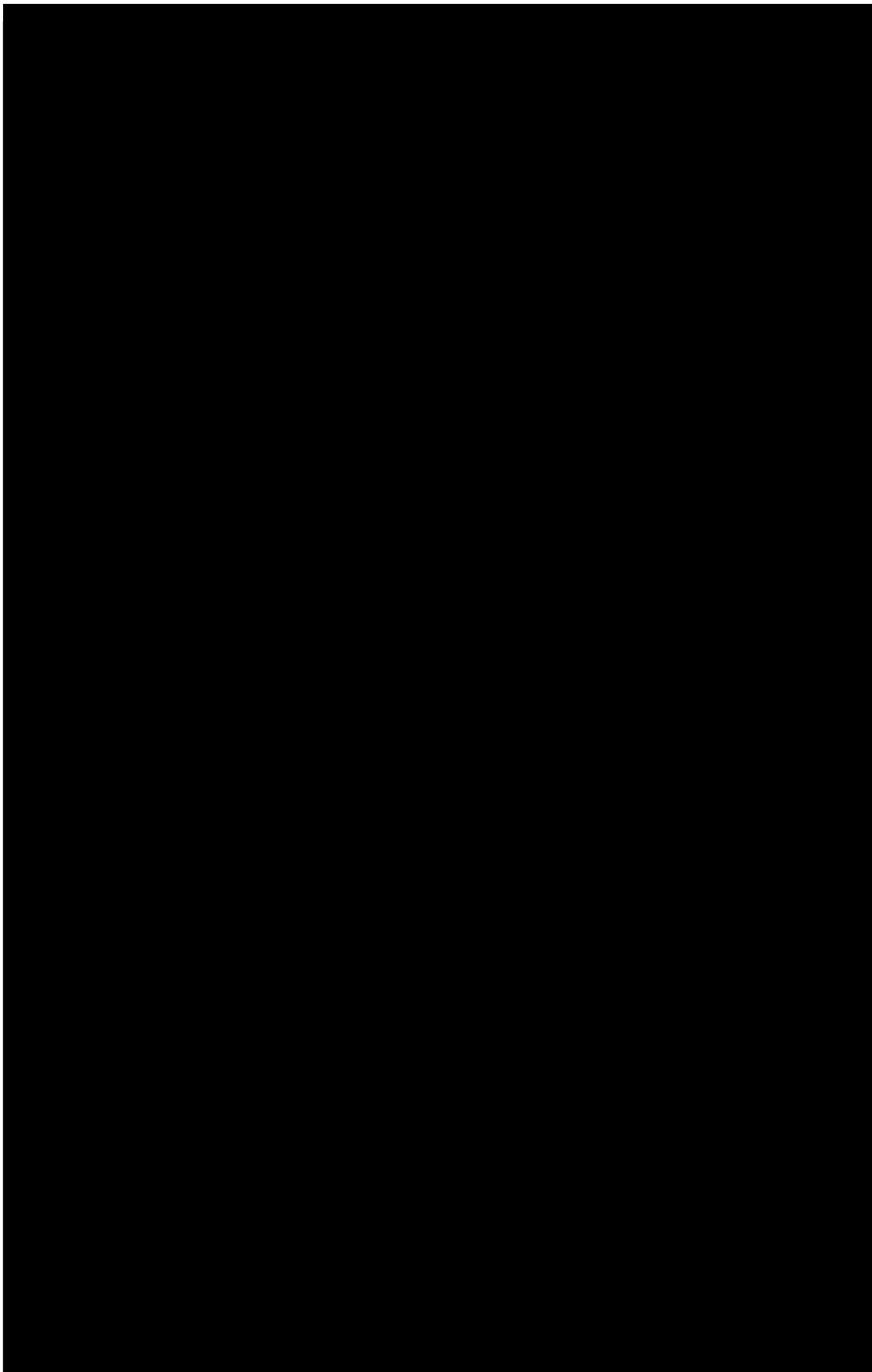
**By:** Sean Kirschenstein, Director

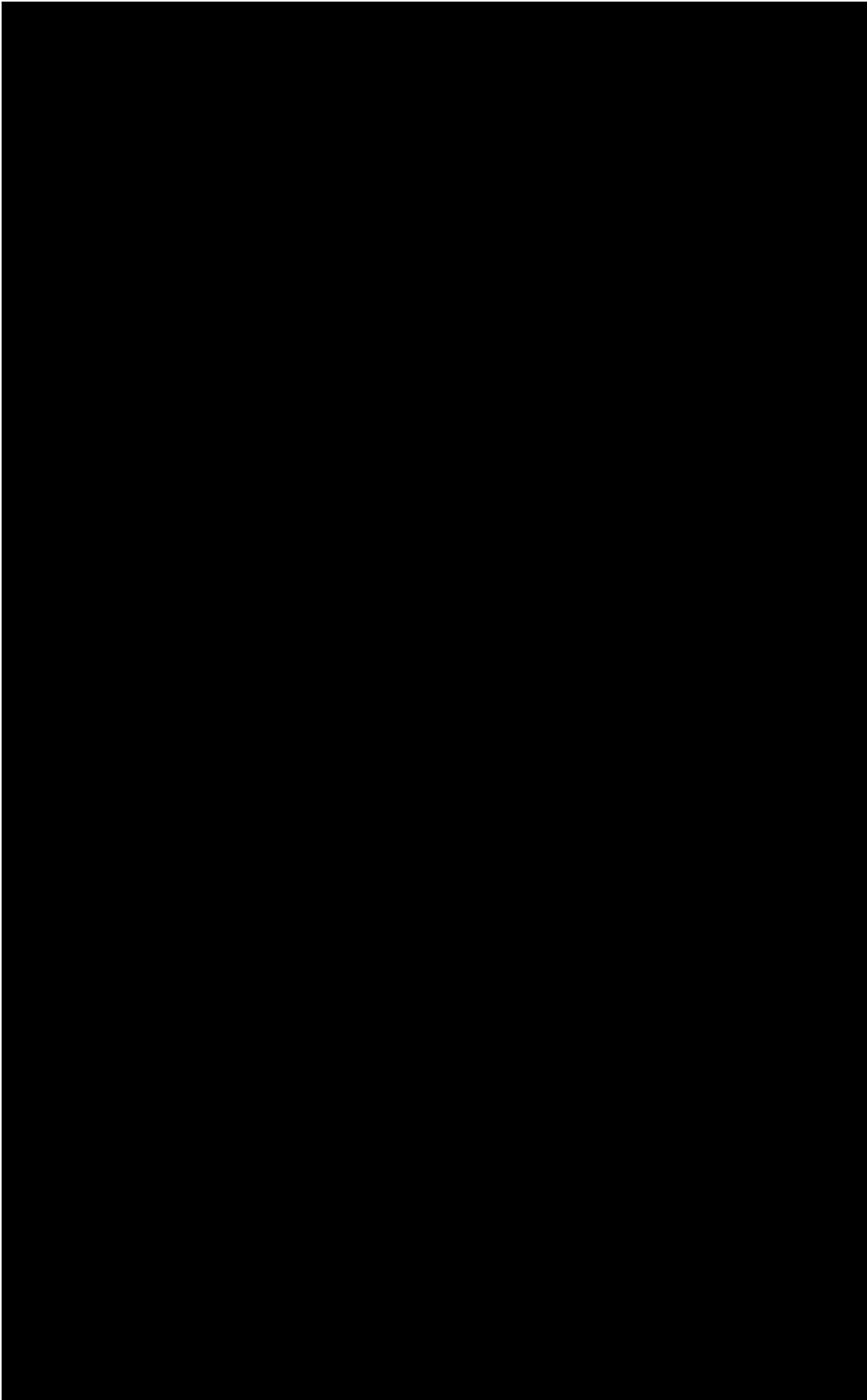
**Date:** November 14, 2023

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# **EXHIBIT P**



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fax +1-310-564-1944



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ATA Member Number: 248719

## CERTIFIED TRANSLATION

### Description of Document(s):

<b>CHAT MESSAGES</b>
<b>IRI-SU-000177</b>

Source Language: **CHINESE**

Target Language: **ENGLISH**

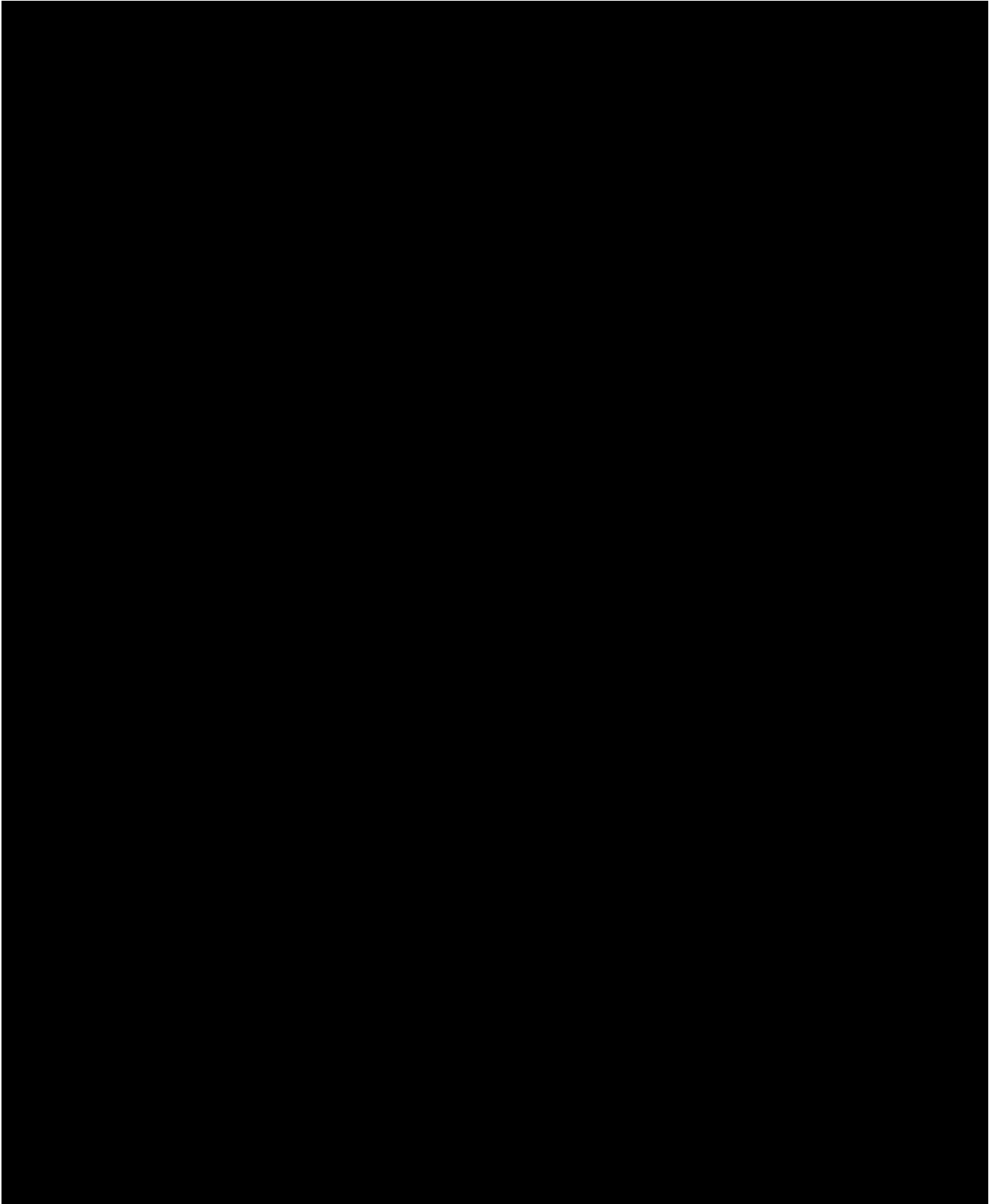
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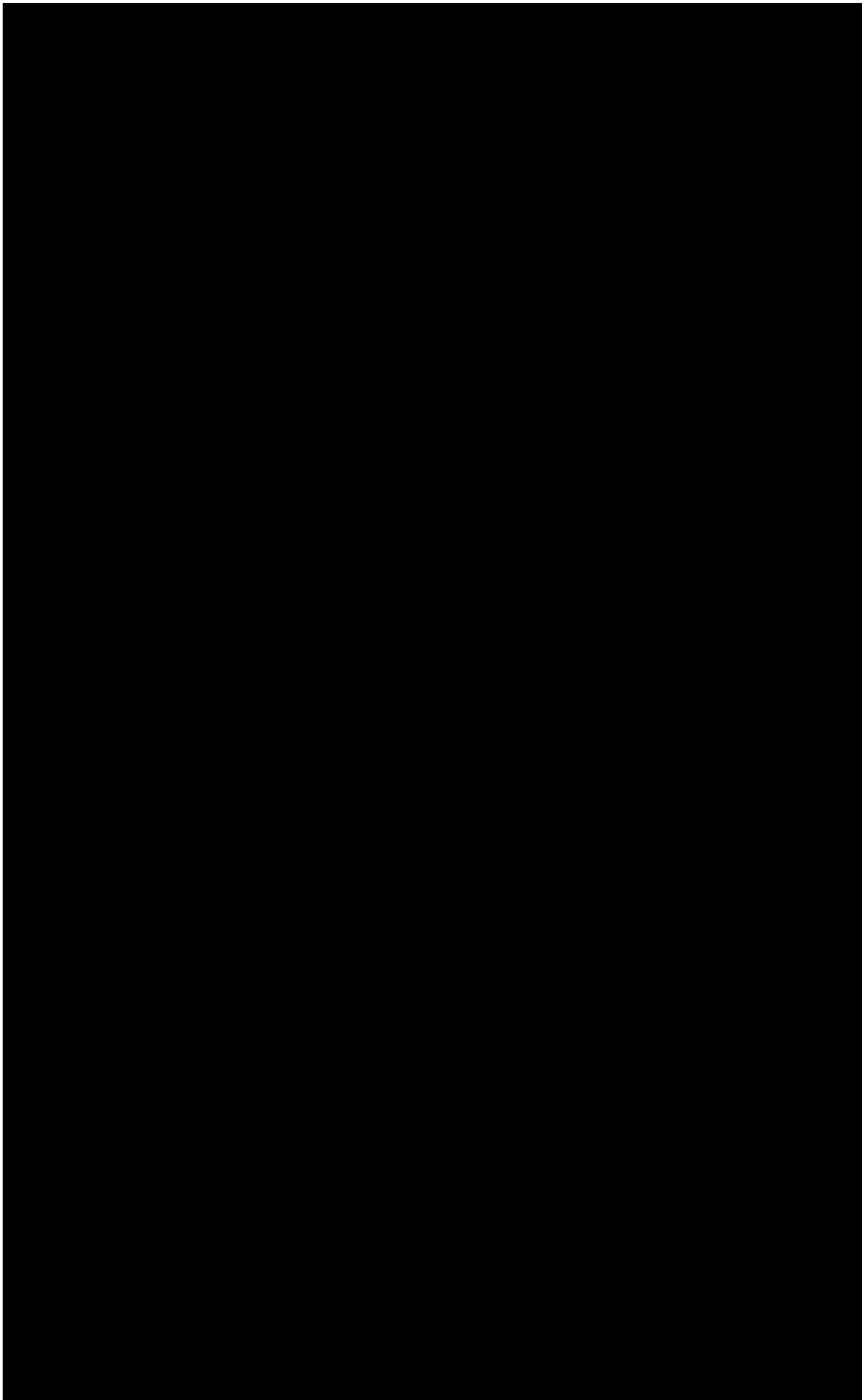
By: Sean Kirschenstein, Director

Date: November 14, 2023

A copy of the translated version(s) is attached to this statement of certification.







# EXHIBIT Q



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fax +1-310-564-1944



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## CERTIFIED TRANSLATION

### Description of Document(s):

<b>CHAT MESSAGES</b>
<b>IRI-SU-000188</b>

Source Language: **CHINESE**

Target Language: **ENGLISH**

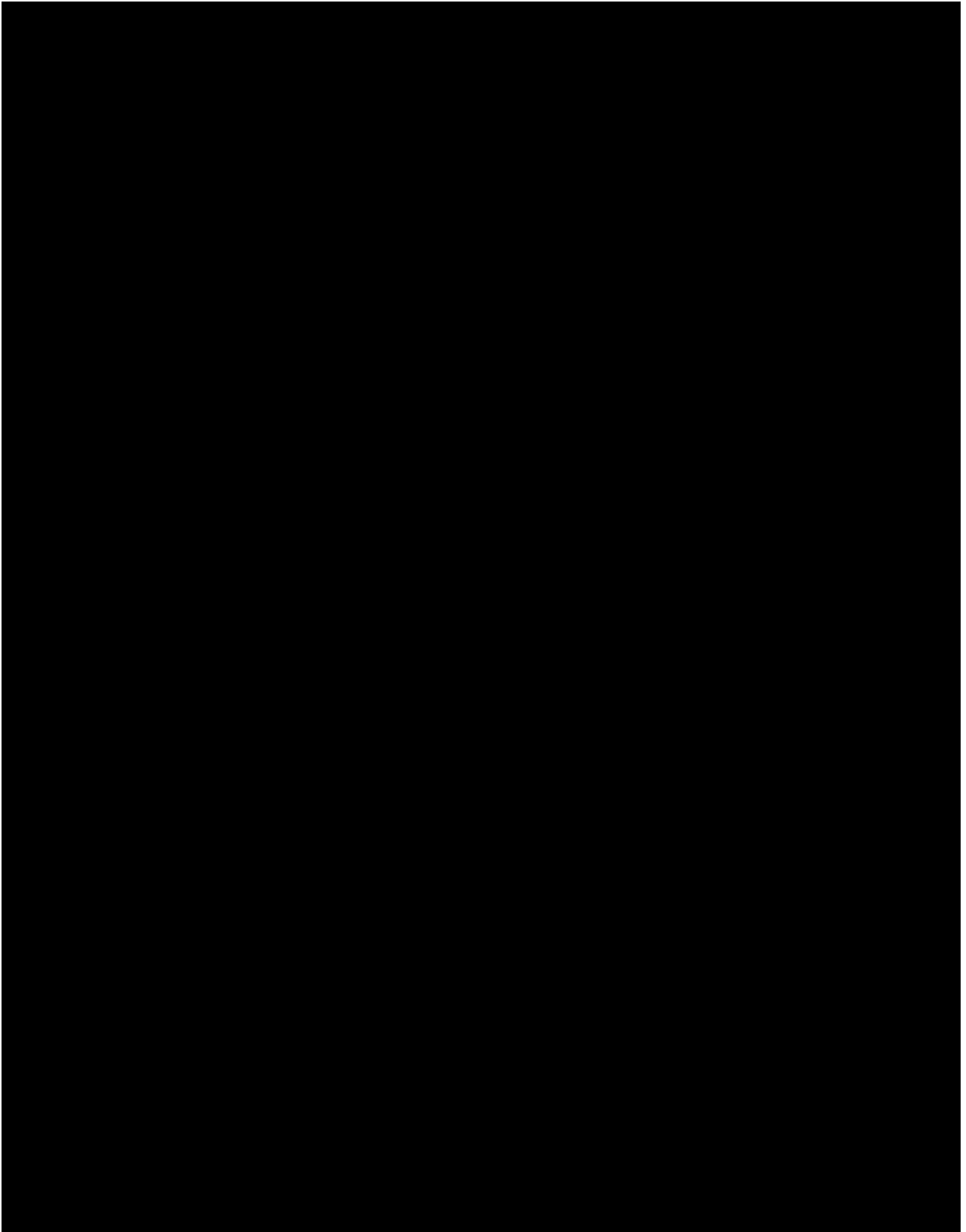
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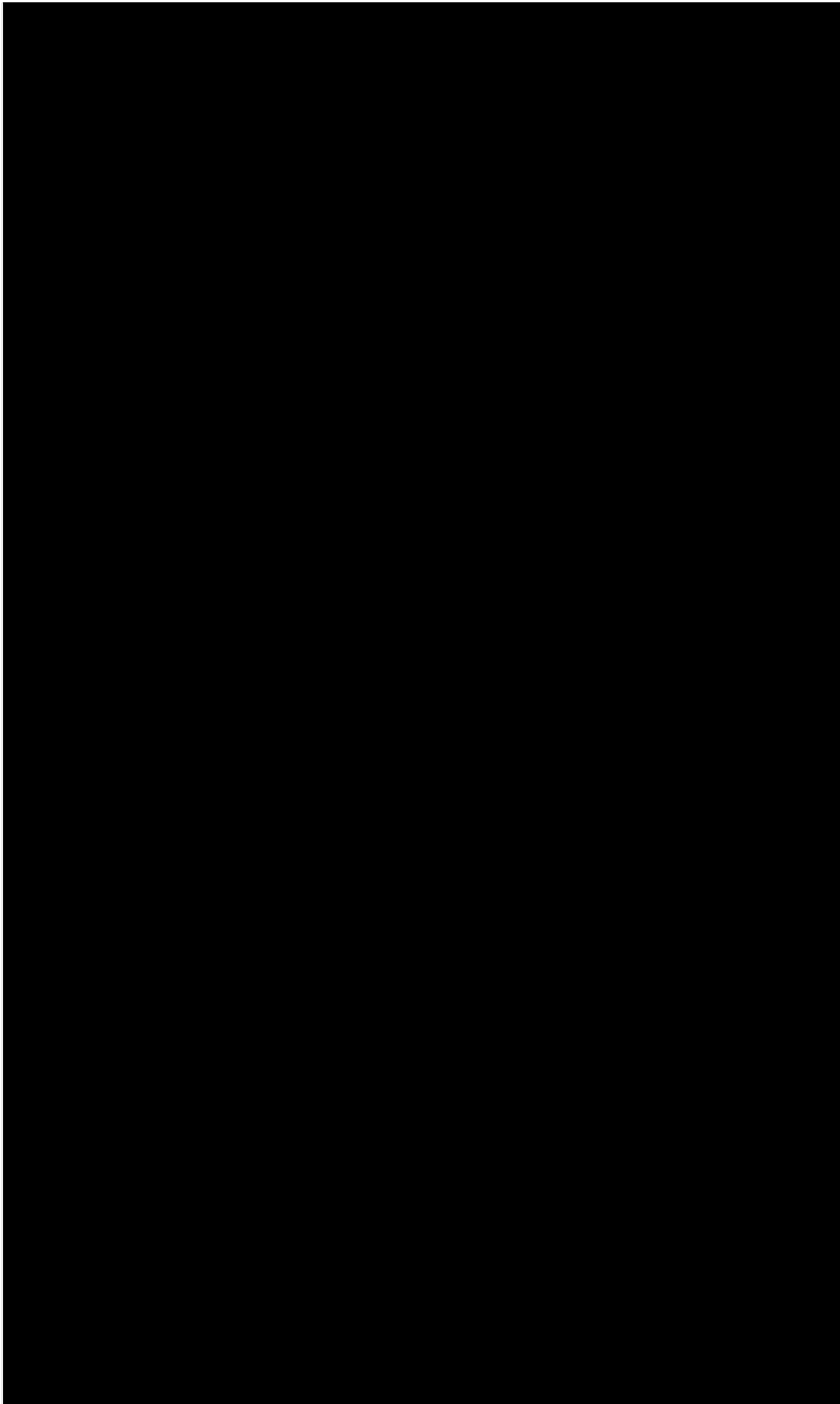
IN WITNESS WHEREOF, Language Fish LLC has caused the Certificate to be signed by its duly authorized officer(s).

By: Sean Kirschenstein, Director

Date: November 14, 2023

A copy of the translated version(s) is attached to this statement of certification.





# **EXHIBIT R**



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## CERTIFIED TRANSLATION

### Description of Document(s):

<b>SYSTEM COMMUNICATIONS / EXCEL SHEET</b>
<b>IRI-SU-001454</b>

Source Language: <b>CHINESE</b>	Target Language: <b>ENGLISH</b>
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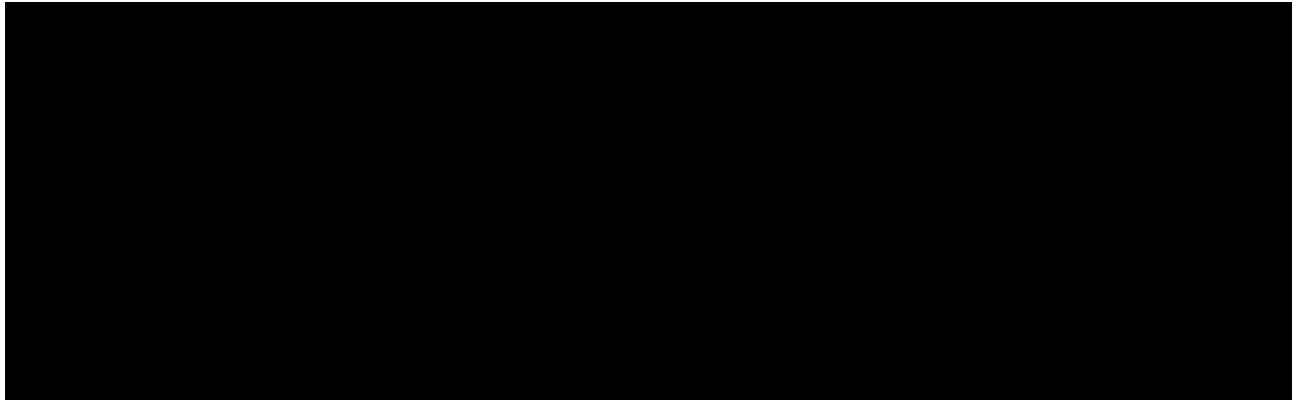
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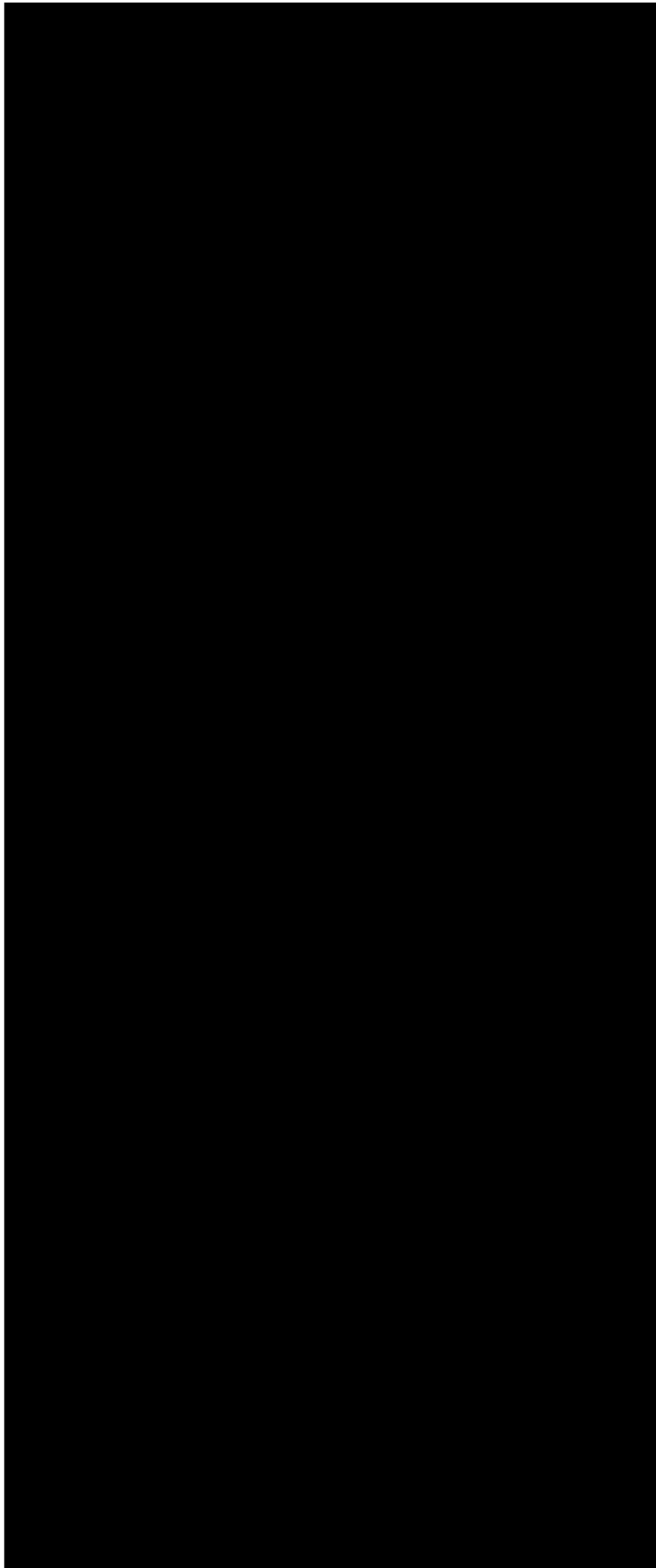
By: Sean Kirschenstein, Director

Date: November 14, 2023

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# **EXHIBIT S**



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## CERTIFIED TRANSLATION

### Description of Document(s):

<b>SYSTEM COMMUNICATIONS / EXCEL SHEET</b>
<b>IRI-SU-001450</b>

Source Language: <b>CHINESE</b>	Target Language: <b>ENGLISH</b>
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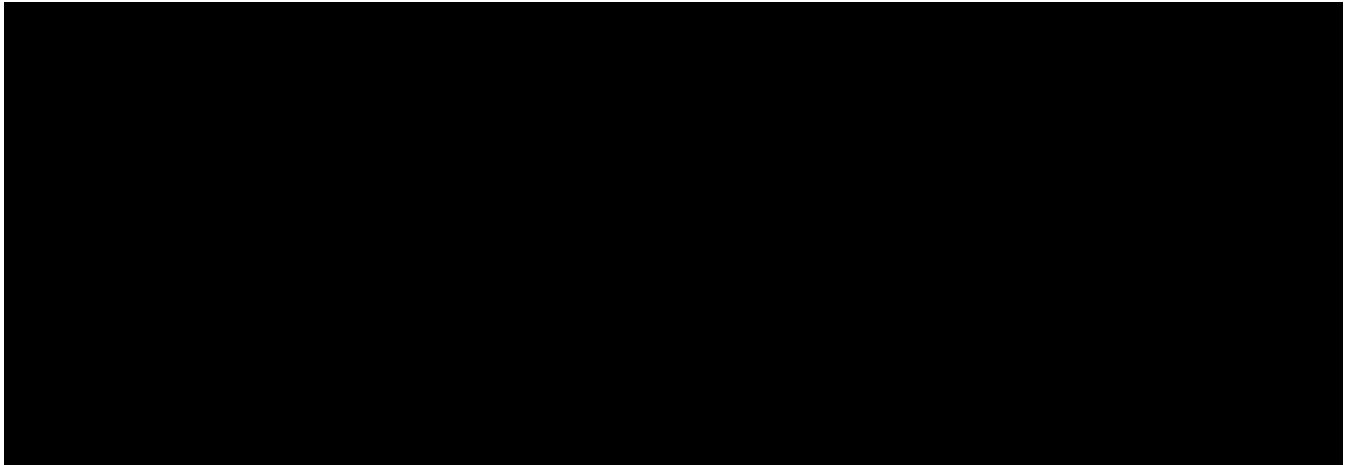
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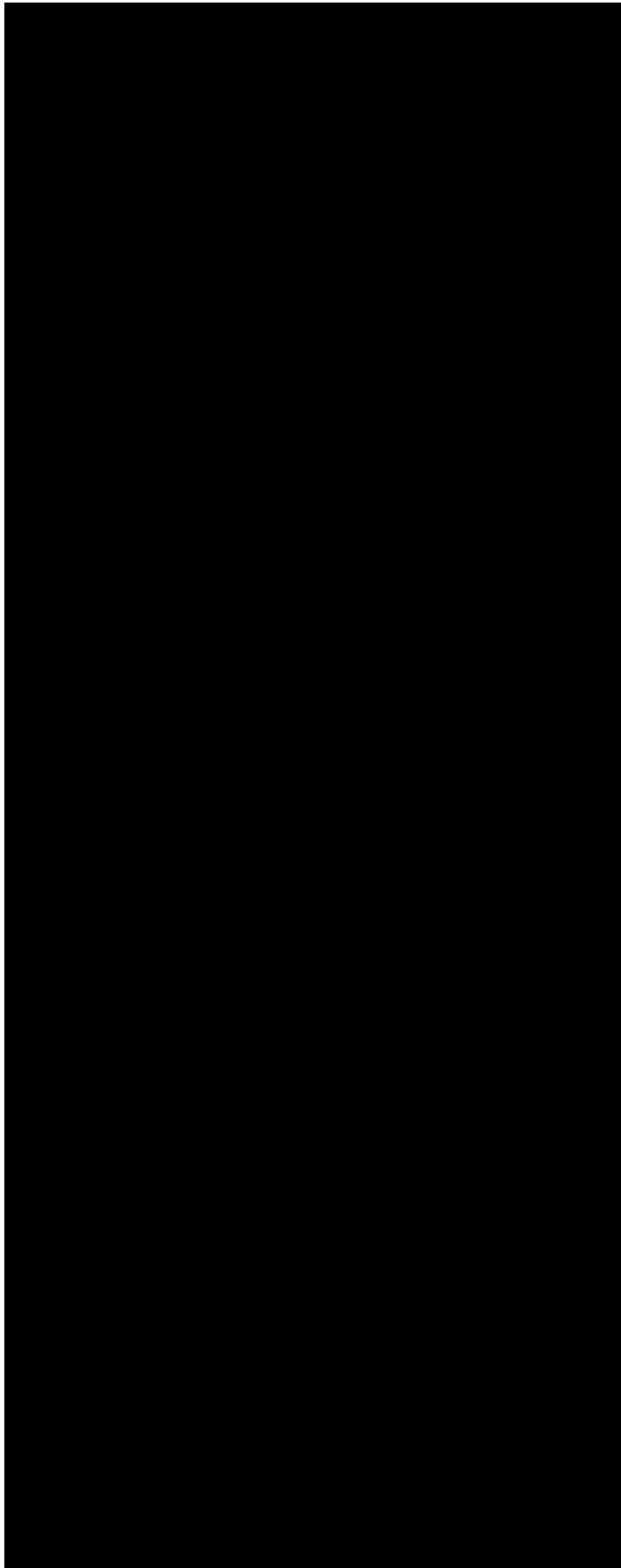
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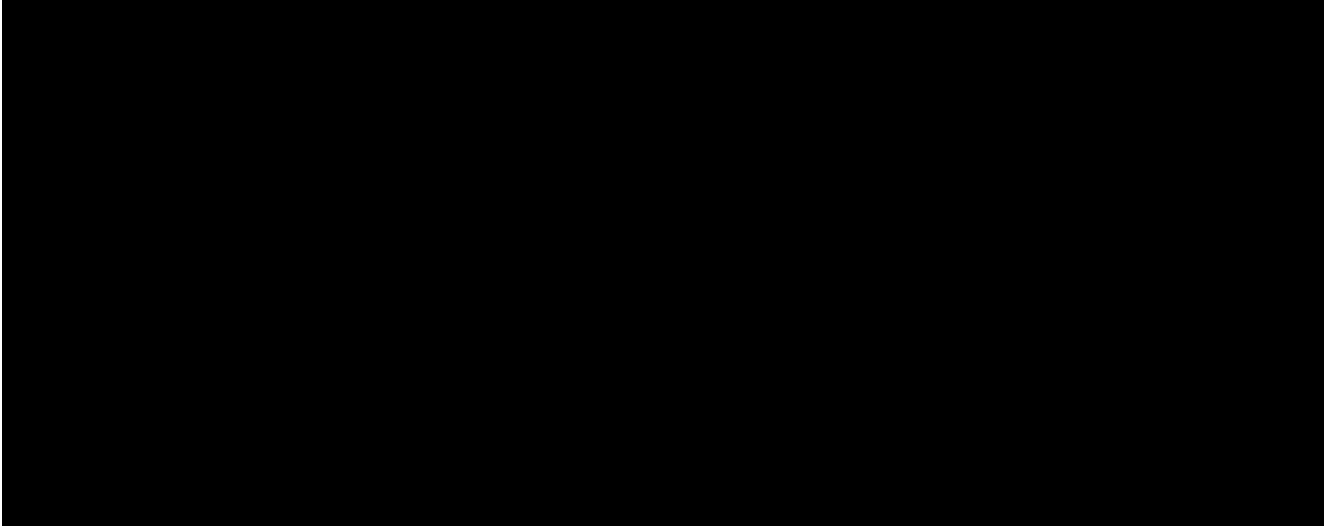
By: Sean Kirschenstein, Director

Date: November 14, 2023

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# **EXHIBIT T**





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## CERTIFIED TRANSLATION

### Description of Document(s):

<b>EMAIL CORRESPONDENCE /</b>
<b>MEETING MINUTES OF THE BOARD OF DIRECTORS OF ORION CO., LTD</b>
<b>IRI-SU-000233, IRI-SU-000236</b>

Source Language: <b>CHINESE</b>	Target Language: <b>ENGLISH</b>
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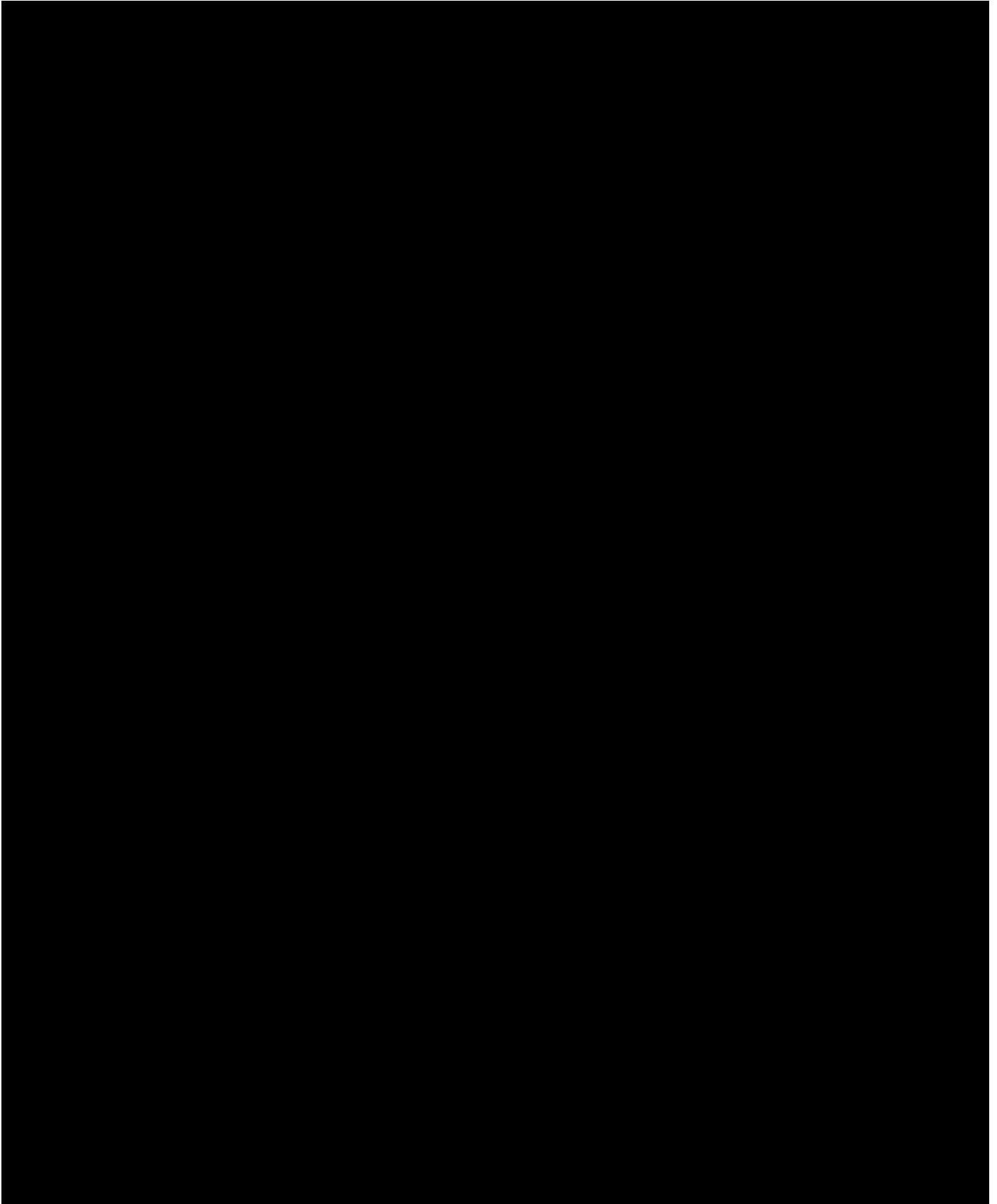
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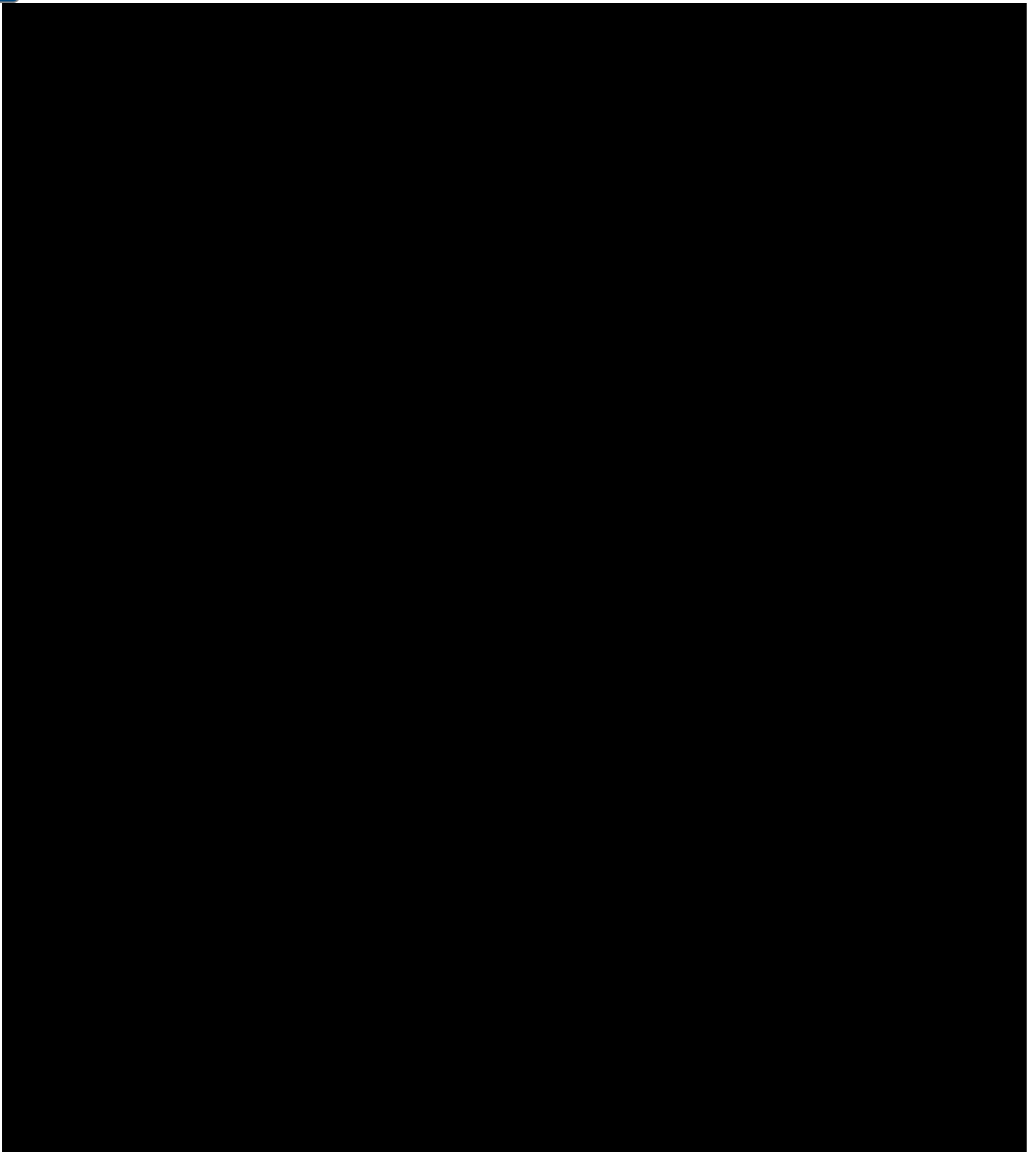
IN WITNESS WHEREOF, Language Fish LLC has caused the Certificate to be signed by its duly authorized officer(s).

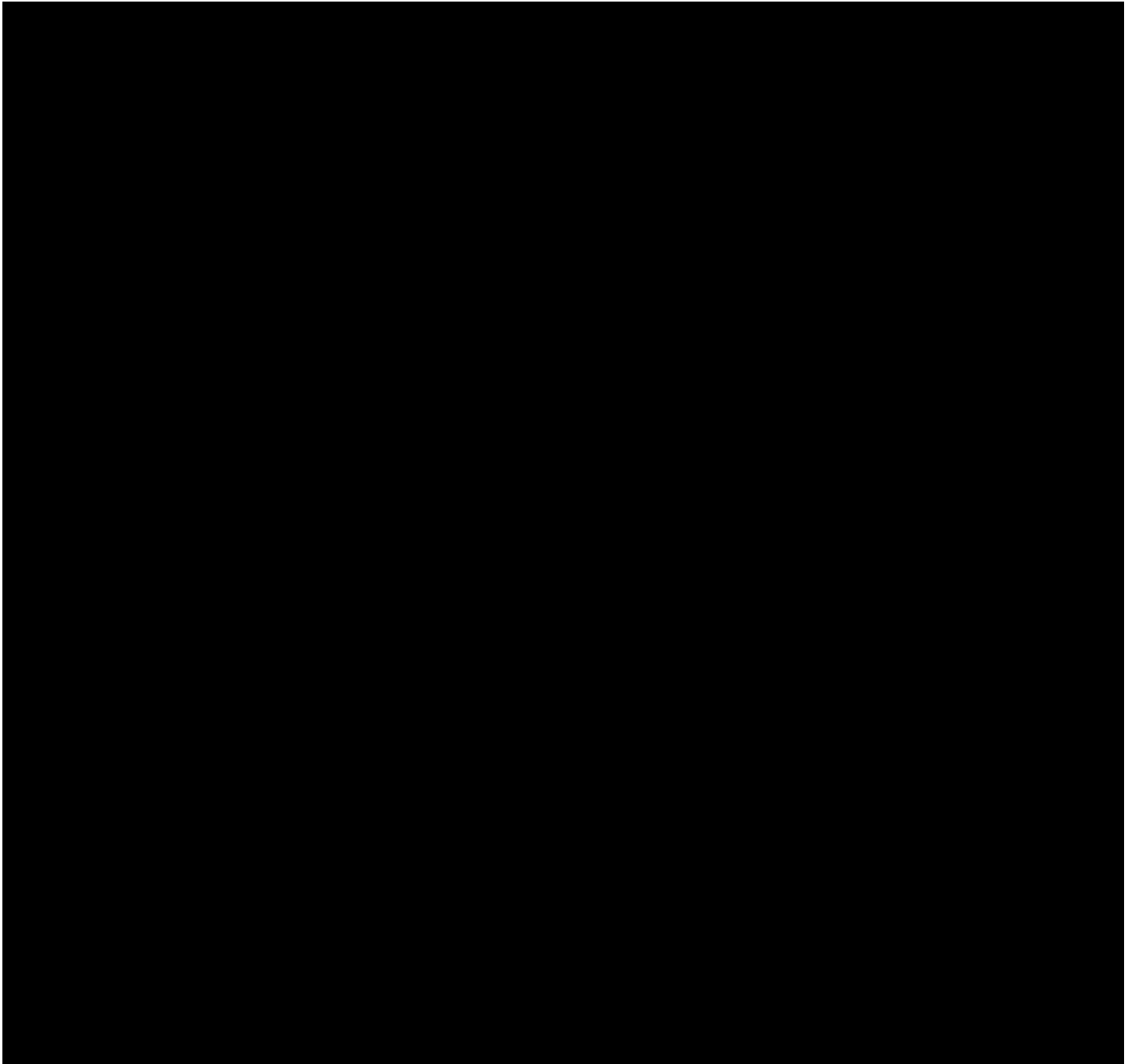
**By:** Sean Kirschenstein, Director

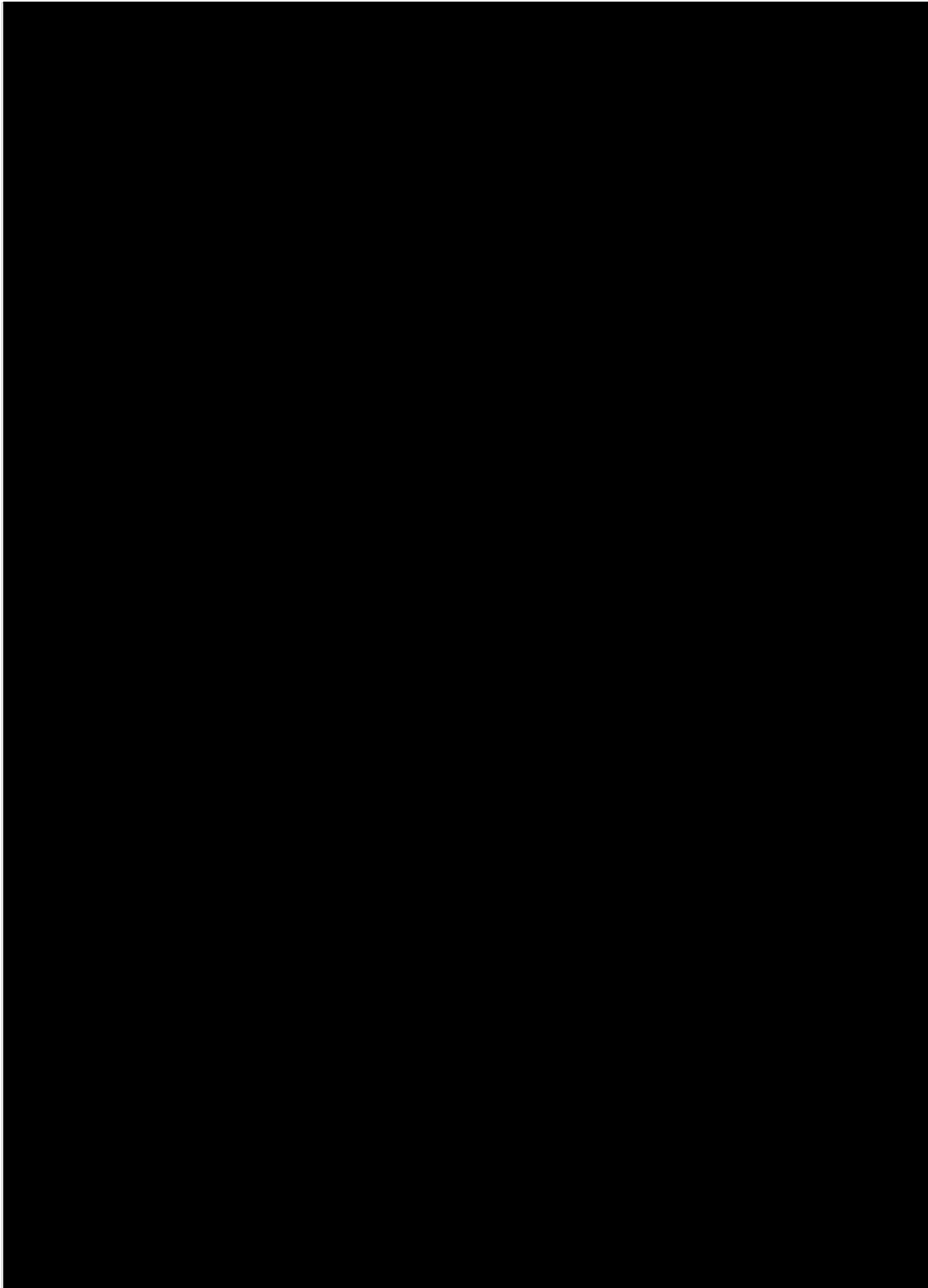
**Date:** November 14, 2023

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# **DOCUMENT 26**

**BAKER BOTTS** LLP

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20001

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**WASHINGTON**

November 16, 2023

CONFIDENTIAL

VIA E-MAIL [VRW@JUDGEWALKER.COM]

John Taladay  
TEL: 2026397909  
FAX: 2026391165  
john.taladay@bakerbotts.com

The Honorable Vaughn R. Walker  
Law Office of Vaughn R. Walker  
Four Embarcadero Center, Suite 2200  
San Francisco, CA 94111

Re: In re Cathode Ray Tube (CRT) Antitrust Litigation, MDL No. 1917, Master File  
No. 07-CV-944-JST

Dear Judge Walker:

Defendants Irico Group Corp. and Irico Display Devices Co., Ltd. (collectively, “Irico”) write in reference to Plaintiffs’ Motion for Discovery Sanctions (the “Motion”). As previously reported, in response to the Special Master’s First and Second Interim Reports and Recommendations dated August 4, 2023 (ECF No. 6233), and September 1, 2023 (ECF No. 6275) (collectively, the “Orders”), counsel for Irico made supplemental productions of documents to Plaintiffs on October 13 and 23, 2023, regarding the departure of Su Xiaohua from Irico. Those productions reflect that the basic information and circumstances of Mr. Su’s departure remain largely unchanged. In the interest of ensuring accurate disclosures, however, certain clarifications to prior factual representations to the Special Master are summarized below and provided in the attached documents.

- As previously disclosed to the Special Master, the earliest written evidence of Mr. Su’s intent to resign from his positions at Irico are minutes of an April 7, 2022, meeting of Irico Group’s leadership (“April 7 Meeting”). *See* Attachment A (IRI-SU-000137E). Under standard Irico personnel policies, Mr. Su was entitled to resign from all management roles at the end of the year in which he turned 58 years old, which was December 2022. *See* Attachment B (IRI-SU-001254E) at -278E. We now understand that, at the April 7 Meeting, Irico Group leadership was approving a request to resign from his management roles before December 2022 that Mr. Su had made orally to at least one participant of the April 7 Meeting. Mr. Su’s pending deposition was not raised, discussed or considered by the participants in the April 7 Meeting. The April 7 Meeting did not specify a particular date by which Mr. Su could or would resign from his positions.
- At some time following the April 7 Meeting, the Irico Group Human Resources department began the process of drafting paperwork and initiating required

**BAKER BOTTS** LLP

The Honorable Vaughn R. Walker

- 2 -

procedures to execute on this approval pursuant to the Irico personnel policies described above. *See, e.g.*, Attachment C (IRI-SU-001423E). Those procedures included interactions between the Human Resources departments of Irico Group and Xianyang Irico Group Industrial Co., Ltd. (“Irico Industrial”). Irico Industrial was the Irico Group subsidiary that directly managed Mr. Su’s management appointments. *See, e.g.* Attachment D (IRI-SU-001446E); Attachment I (IRI-SU-001436E). The Human Resources departments of both Irico Group and Irico Industrial also coordinated with the appropriate entities within the Chinese Communist Party. *See id.*; Attachment E (IRI-SU-000400E).

- At the request of Ms. Hao Li, the head of the Irico Industrial Human Resources department, Mr. Su submitted a letter dated May 5, 2022, to effectuate his departure that had been approved at the April 7 Meeting (the “May 5 Letter”). *See* Attachment F (IRI-SU-000402E) at -403E.
- Later in May 2022, Ms. Hao contacted Mr. Su by phone to request a second version of the May 5 Letter that included different wording regarding Mr. Su’s intent to terminate his employment relationship with the company. We understand that this second version of the letter was requested because Ms. Hao was not certain which version of the letter was required to process Mr. Su’s request to resign early from his management roles. Mr. Su subsequently delivered a copy of this second letter, dated May 25, 2022, in person, to Ms. Hao in Xianyang, China. *See* Attachment G (IRI-SU-000141E). For reference, Attachment G includes Plaintiffs’ proffered translation of Mr. Su’s May 25 letter, which incorrectly describes the date of the letter as “illegible,” the subject of an outstanding translation dispute. This fact that this letter was requested by Ms. Hao after May 5 confirms that May 25, *not* March 25 as speculated by Plaintiffs, is the correct date. *See id.*
- Zhang Wenkai, Assistant General Counsel for Irico Group, was the sole person in contact with Mr. Su regarding the planning of Mr. Su’s deposition. Mr. Zhang learned of Mr. Su’s intent to leave Irico on May 31, 2022. At no point prior to May 31, 2022, did Mr. Su notify Mr. Zhang or anyone in the Irico Group legal department, regarding his intent to leave Irico. As the Special Master is aware from our prior submissions and documentation, Mr. Su continued to work with Mr. Zhang on the logistics for planning his deposition throughout May 2022. *See* Irico Opposition to Plaintiffs’ Motion for Discovery Sanctions (Apr. 21, 2023) at 28-29. When Mr. Zhang learned of Mr. Su’s intent to resign from his positions at Irico, he quickly contacted Mr. Su. Mr. Su then informed Mr. Zhang that he refused to travel to Macau for a deposition.
- A replacement manager to succeed Mr. Su was identified by June 6, 2022. *See* Attachment H (IRI-SU-001006E). Official paperwork to effectuate the formal appointment of Mr. Su’s successor and formalize the dismissal of Mr. Su was



**BAKER BOTTS** LLP

The Honorable Vaughn R. Walker

- 3 -

initially drafted by June 13, 2022, and was finalized and effective on June 17, 2022. *See, e.g.*, Attachment I (IRI-SU-001436E); Attachment J (IRI-SU-000208E). A July 28, 2022 shareholder resolution for Irico (Foshan) Flat Panel Display Co., Ltd. confirmed Mr. Su's removal as a director and manager of the company. *See id.* at -210E.

- We have learned that, pursuant to standard Irico personnel policies and Chinese government regulations, Mr. Su was entitled to receive a monthly living expense stipend from Irico until reaching age 60 as well as certain social insurance benefits. *See* Attachment K (IRI-SU-001473). Mr. Su first received that stipend in July 2022, *see* Attachment L (IRI-SU-001470E), and will continue to receive it on a monthly basis until he reaches the age of 60.

Nothing in this letter or attachments is intended to constitute waiver of any rights or privileges. Any inadvertent disclosure of privileged material should not be construed as a waiver of privilege, as it is Irico's intention to maintain privilege as to all such matters. Please do not hesitate to contact me if you have any questions about the above corrective disclosures.

Sincerely,  
/s/ John M. Taladay  
John M. Taladay

cc: Tanveer Singh (tanveer.singh@fedarb.com)  
R. Alexander Saveri (rick@saveri.com)  
Geoffrey C. Rushing (geoff@saveri.com)  
Matthew D. Heaphy (mheaphy@saveri.com)  
Mario N. Alioto (malioto@tatp.com)  
Lauren C. Capurro (lauren russell@tatp.com)  
Daniel E. Birkhaeuser (dbirkhaeuser@bramsonplutzik.com)

# Attachment A



**certifiedtranslate**  
A LANGUAGE FISH LLC COMPANY

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www.certifiedtranslate.com

2425 Olympic Blvd., Suite 4000W  
Santa Monica, CA 90404

usa 1-888-856-2228  
int +1-310-684-3153  
fax +1-310-564-1944



A member of the American  
Translators Association  
ATA Member Number: 248719

## CERTIFIED TRANSLATION

### Description of Document(s):

<b>IRICO GROUP CO., LTD. MEETING MINUTES</b>
<b>APRIL 7, 2022</b>
<b>IRI-SU-000137 through IRI-SU-000140</b>

Source Language: <b>CHINESE</b>	Target Language: <b>ENGLISH</b>
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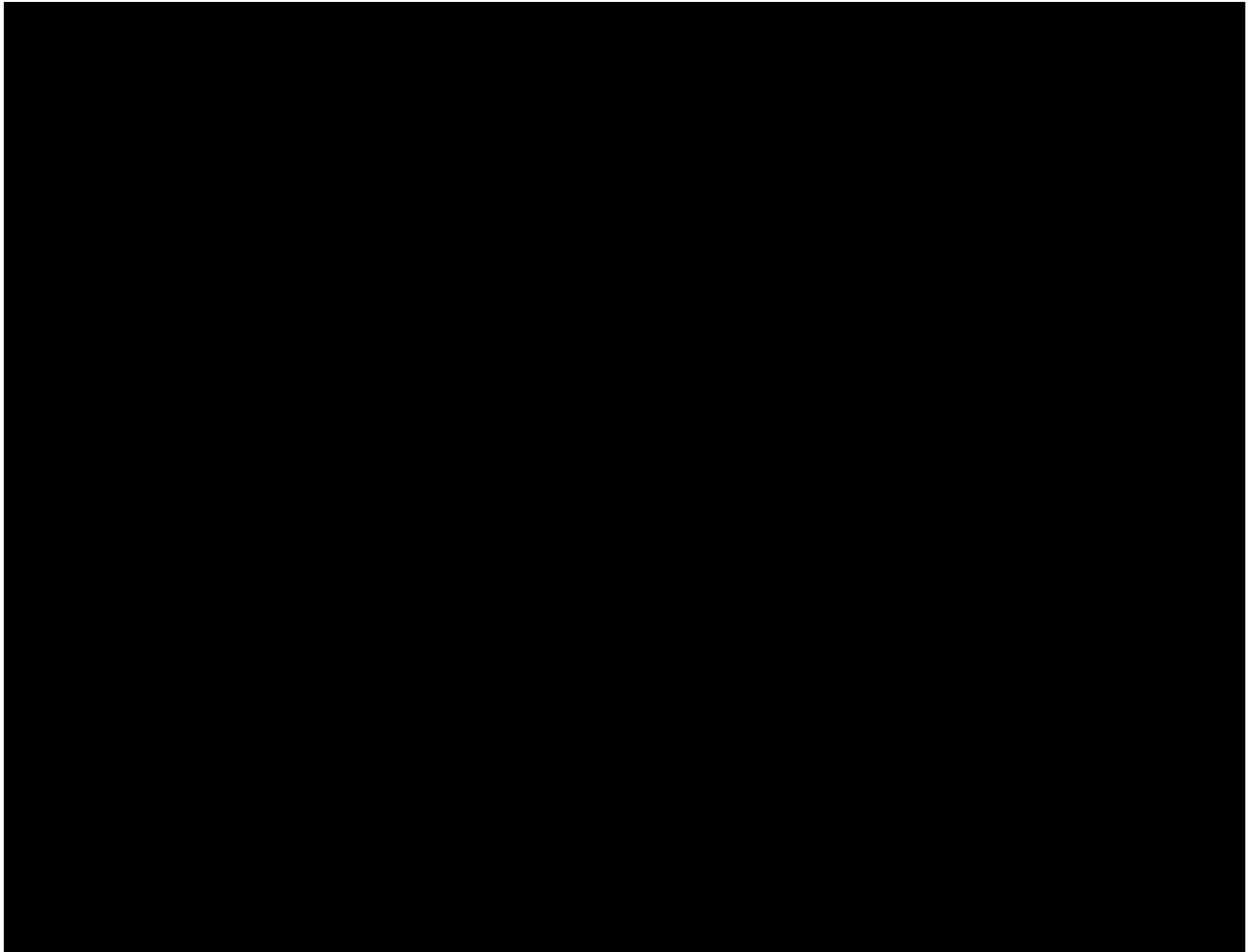
WITH REFERENCE TO THE ABOVE MENTIONED MATERIALS/DOCUMENTS, we at Language Fish LLC (doing business as www.certifiedtranslate.com), a professional document translation company, attest that the language translation completed by Language Fish's certified professional translators, represents, to the best of our judgment, an accurate and correct interpretation of the terminology/content of the source document(s). **This is to certify the correctness of the translation only.** We do not guarantee that the original is a genuine document or that the statements contained in the original document(s) are true.

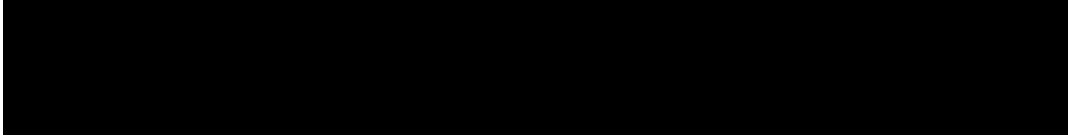
IN WITNESS WHEREOF, Language Fish LLC has caused the Certificate to be signed by its duly authorized officer(s).

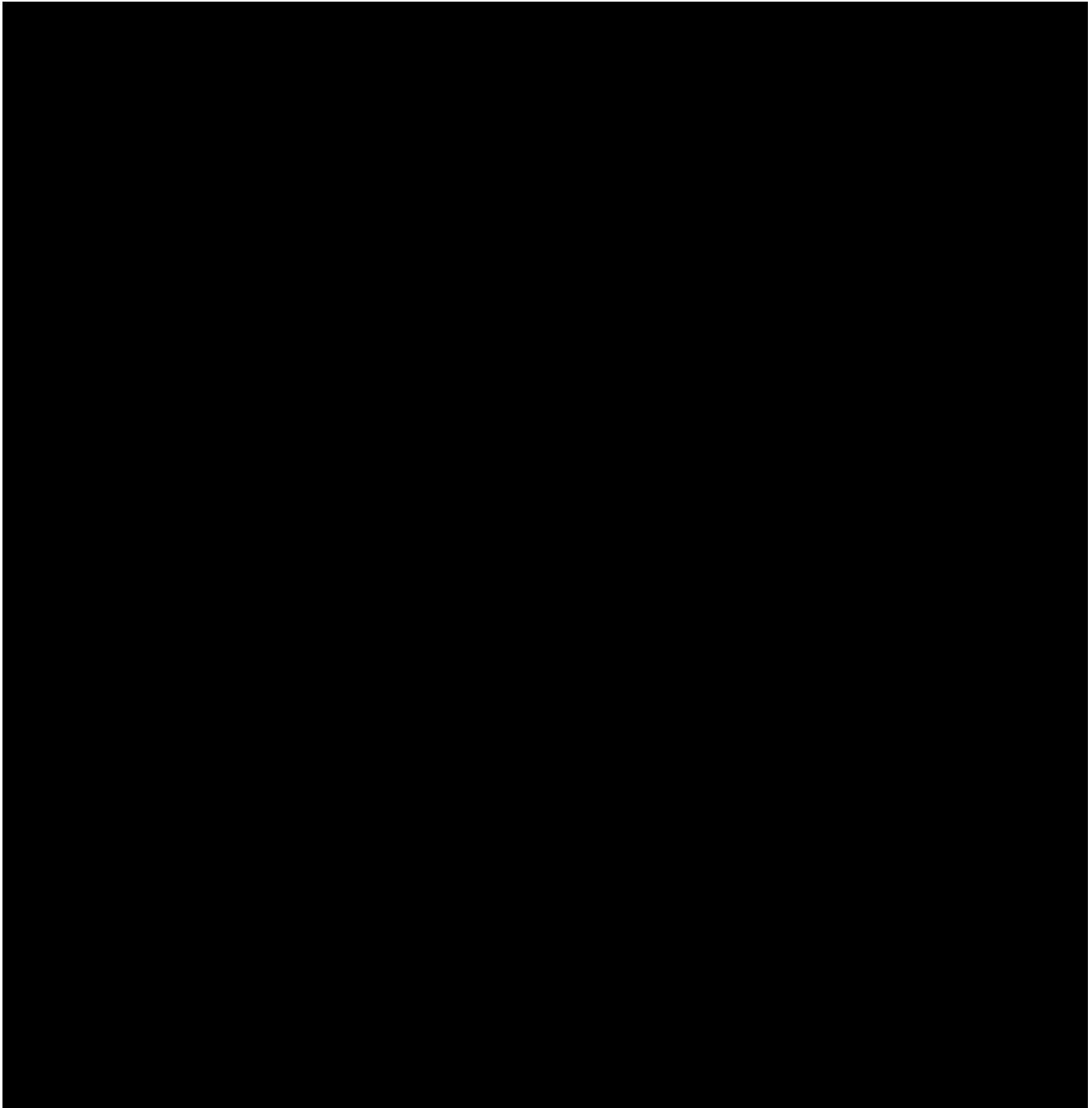
**By:** Sean Kirschenstein, Director

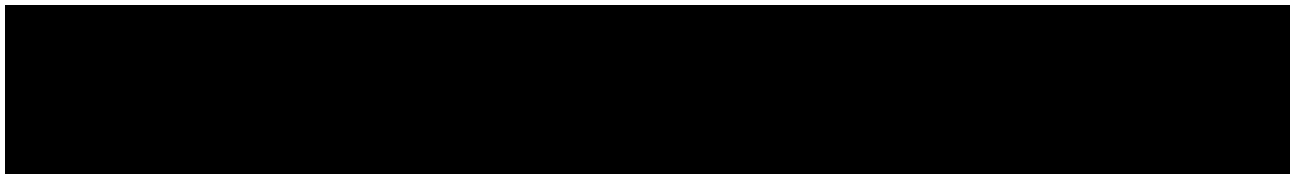
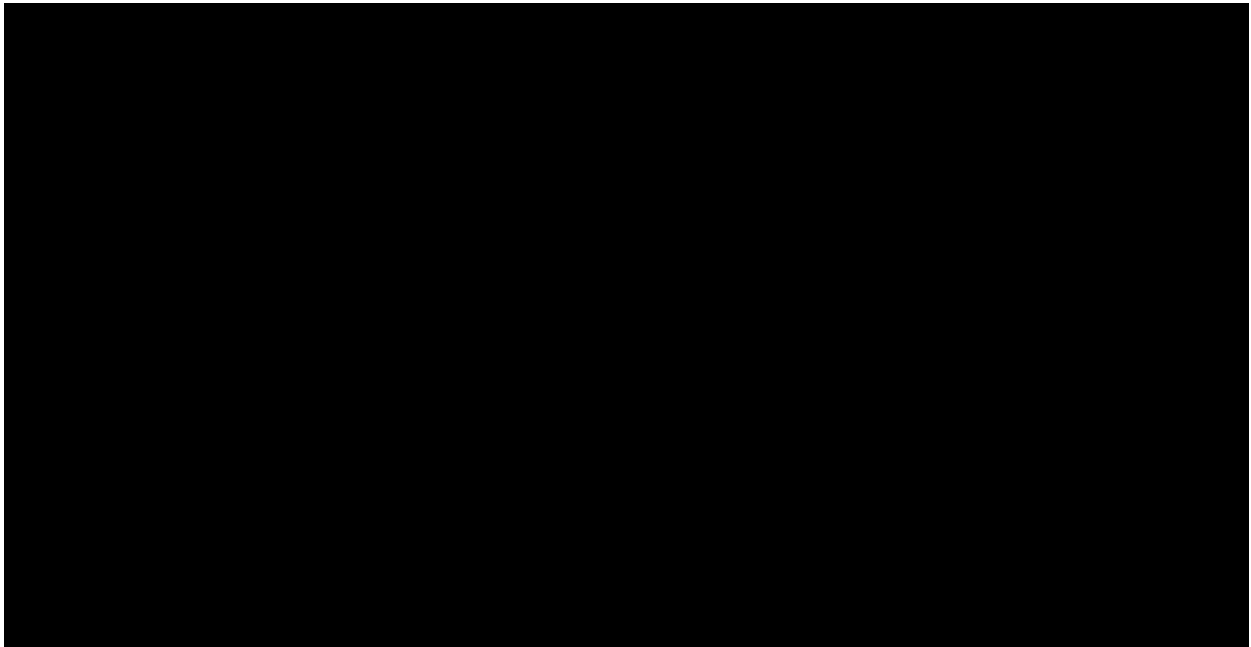
**Date:** January 12, 2023

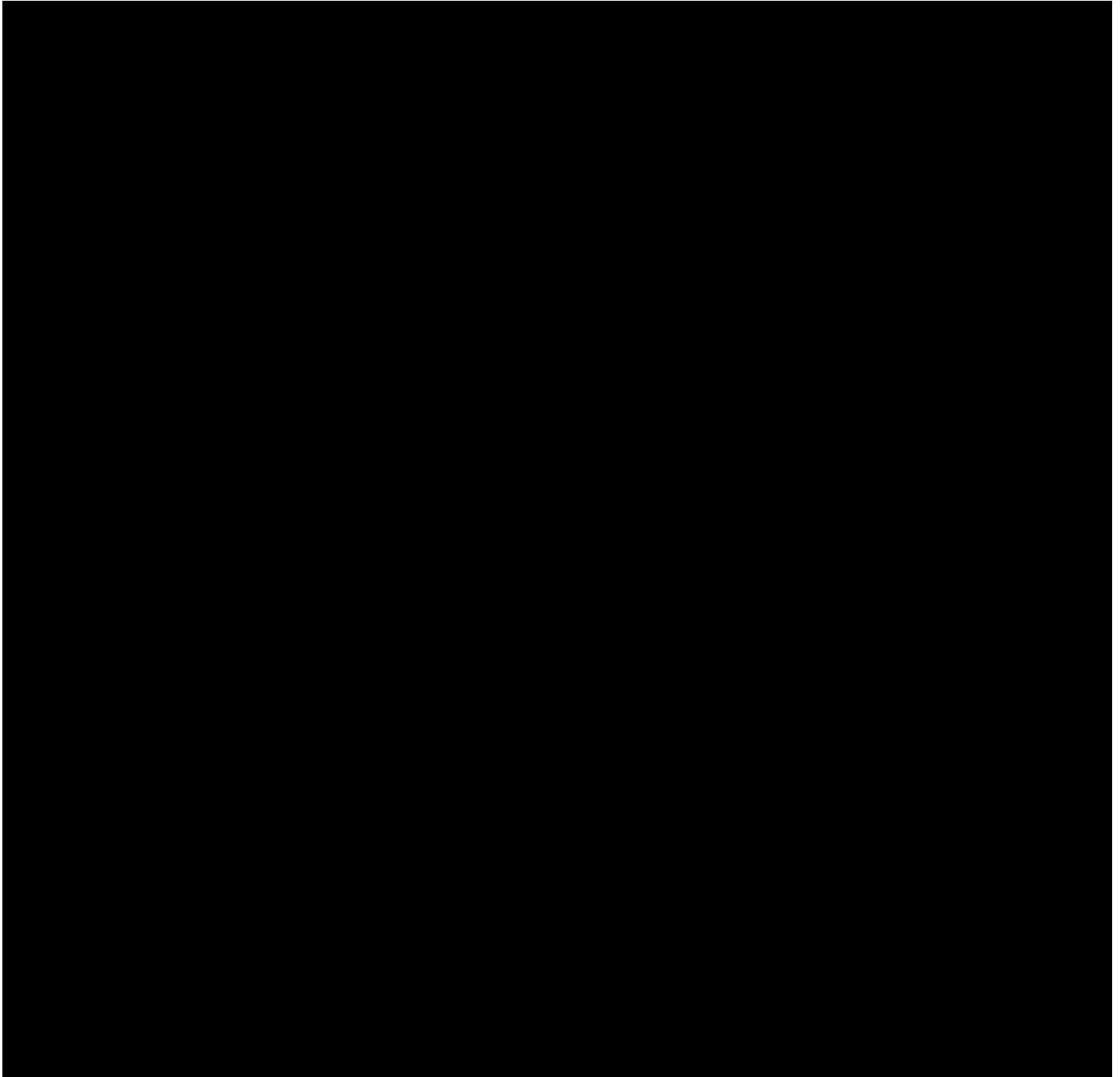
A copy of the translated version(s) is attached to this statement of certification.





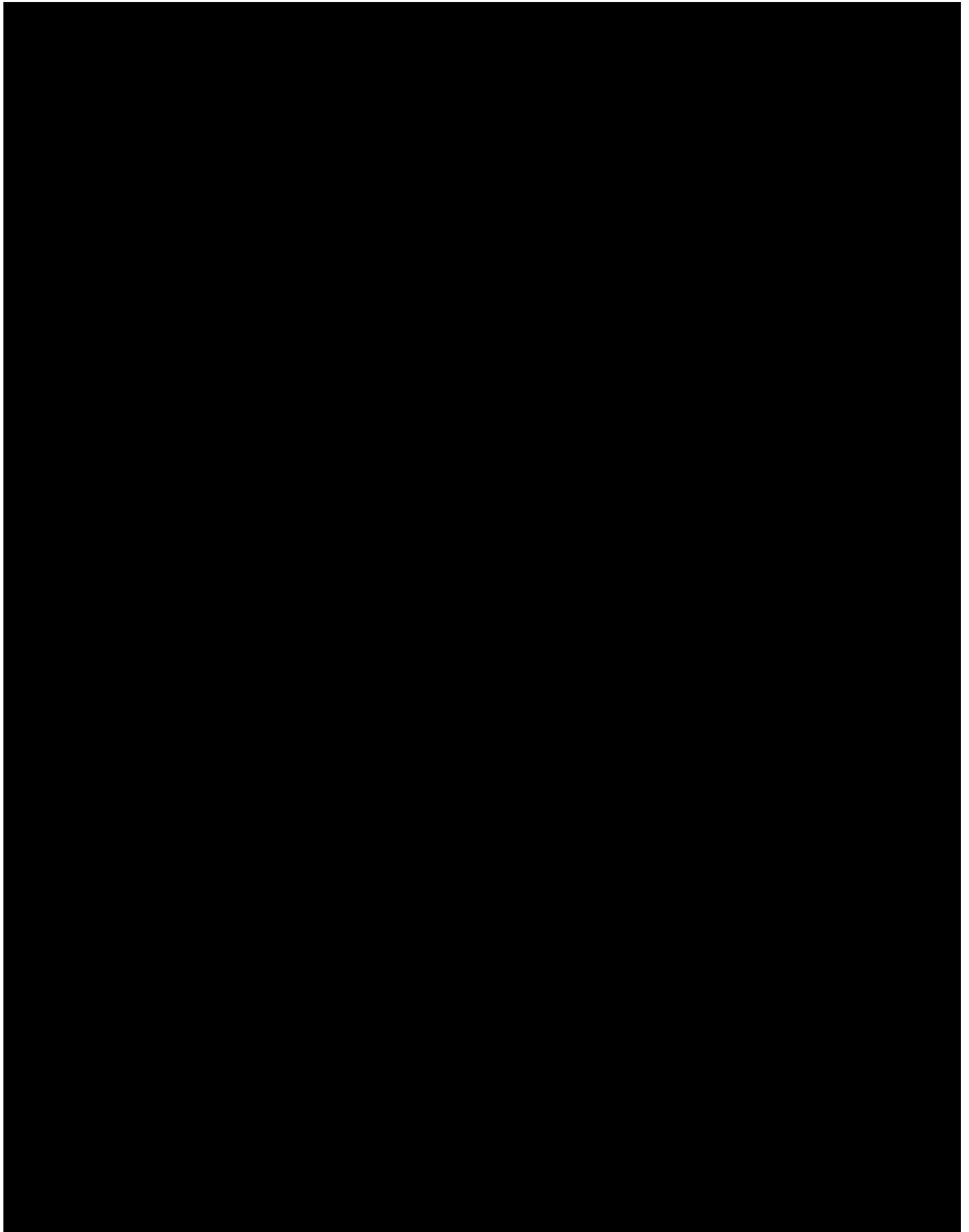


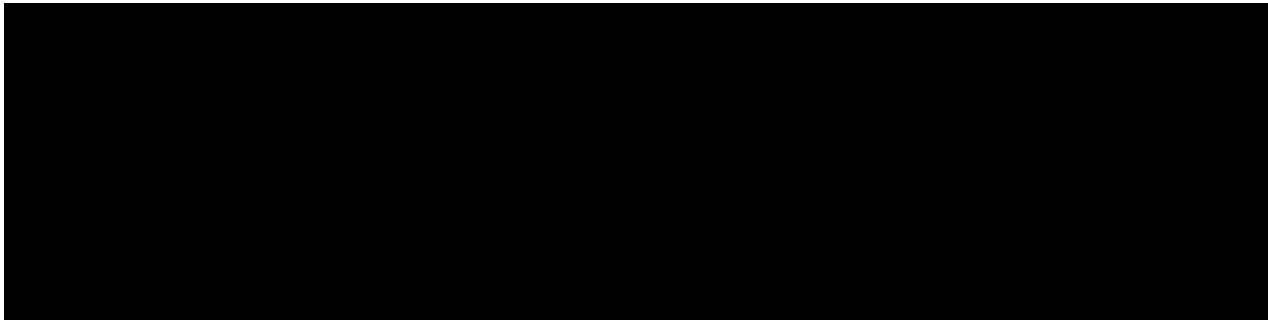












# Attachment B



November 13, 2023

**Certification**

**Welocalize Translations**

**TRANSLATOR'S DECLARATION:**

I, **Johnson Wong**, hereby declare:

That I possess advanced knowledge of the Chinese and English languages. The attached Chinese into English translation has been translated by me and to the best of my knowledge and belief, it is a true and accurate translation of the document with bates numbers range:- IRI-SU-001254 - IRI-SU-001255

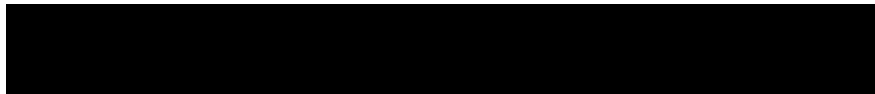
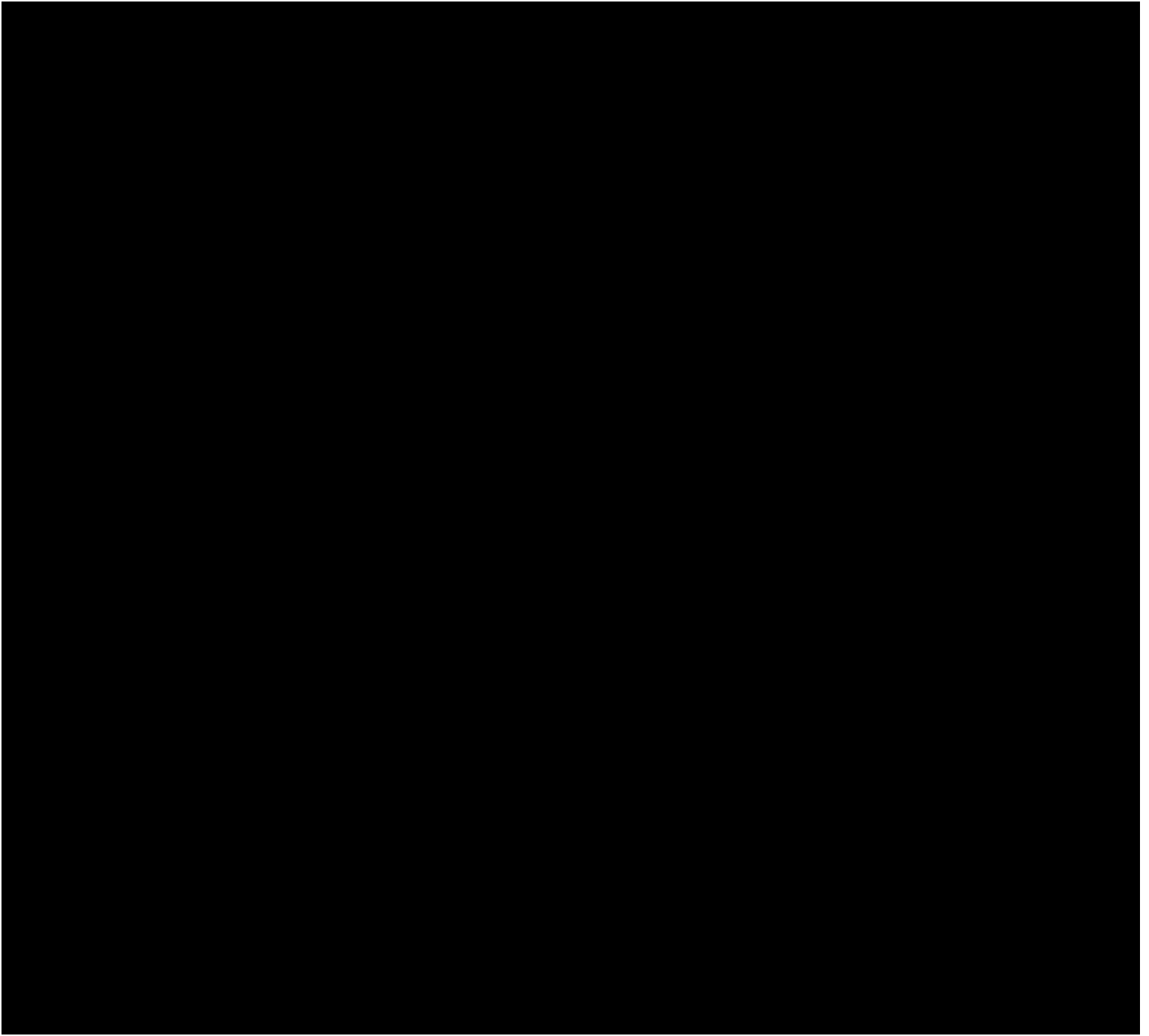
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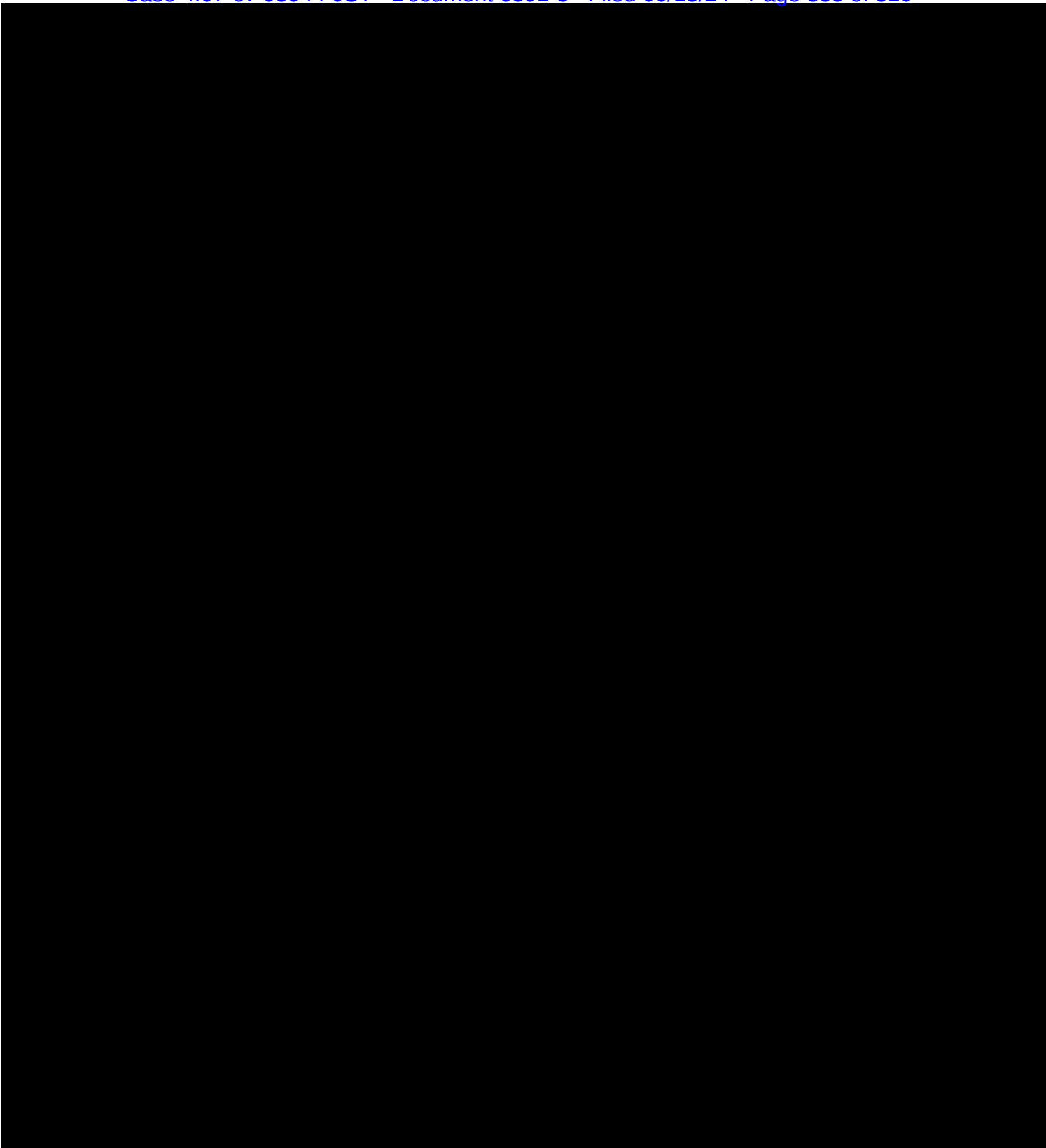
A handwritten signature in black ink, appearing to be "J. Wong", written over a horizontal line.

**Johnson Wong**

Project Number: BBLLP\_2311\_P0043

15 W. 37th Street 4th Floor  
New York, NY 10018  
212.581.8870







November 13, 2023

**Certification**

**Welocalize Translations**

**TRANSLATOR'S DECLARATION:**

I, **Johnson Wong**, hereby declare:

That I possess advanced knowledge of the Chinese and English languages. The attached Chinese into English translation has been translated by me and to the best of my knowledge and belief, it is a true and accurate translation of the document with bates numbers range:- IRI-SU-001278- IRI-SU-001279

*(Digital or printed signature here above the line)*

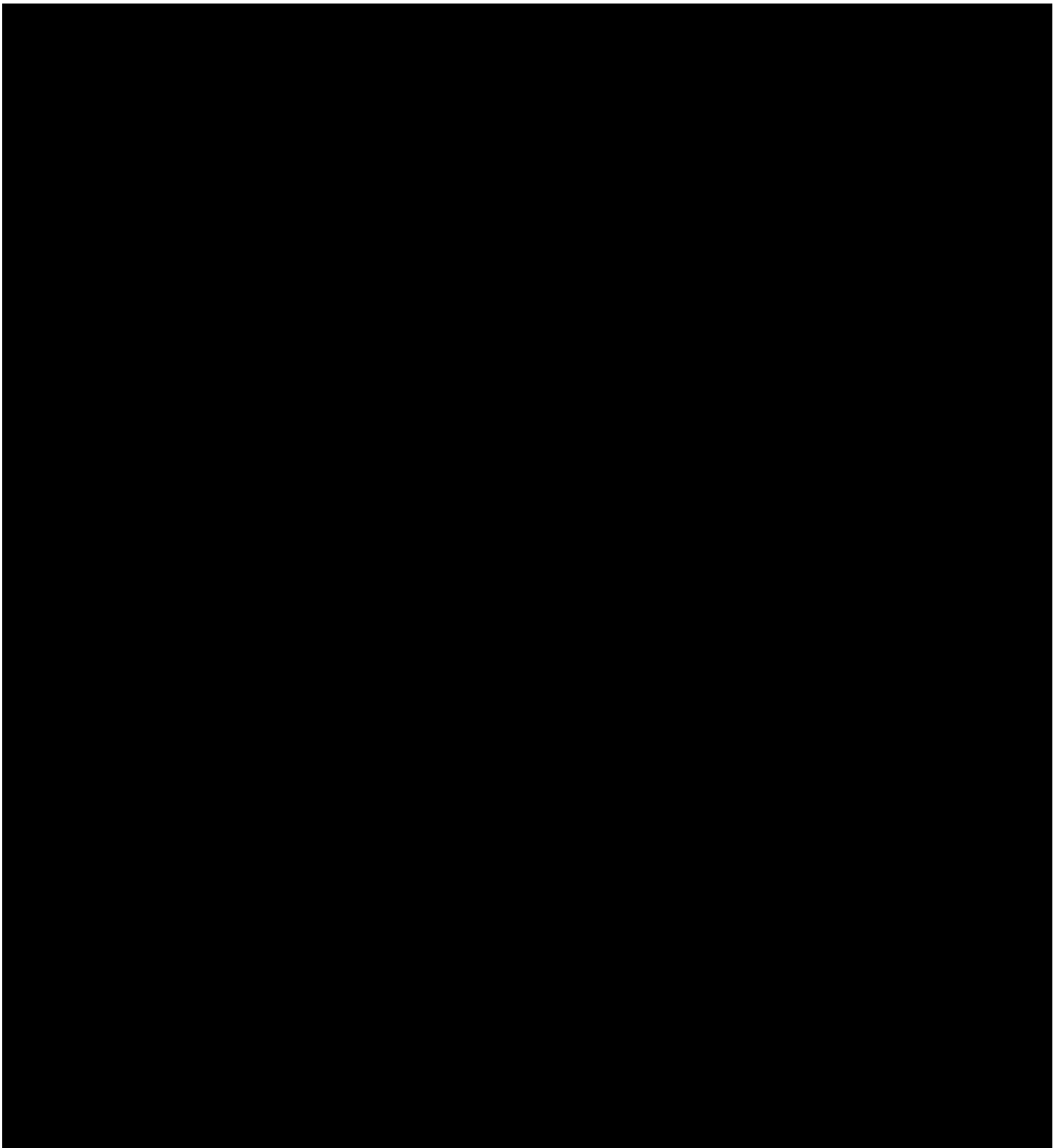
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**Johnson Wong**

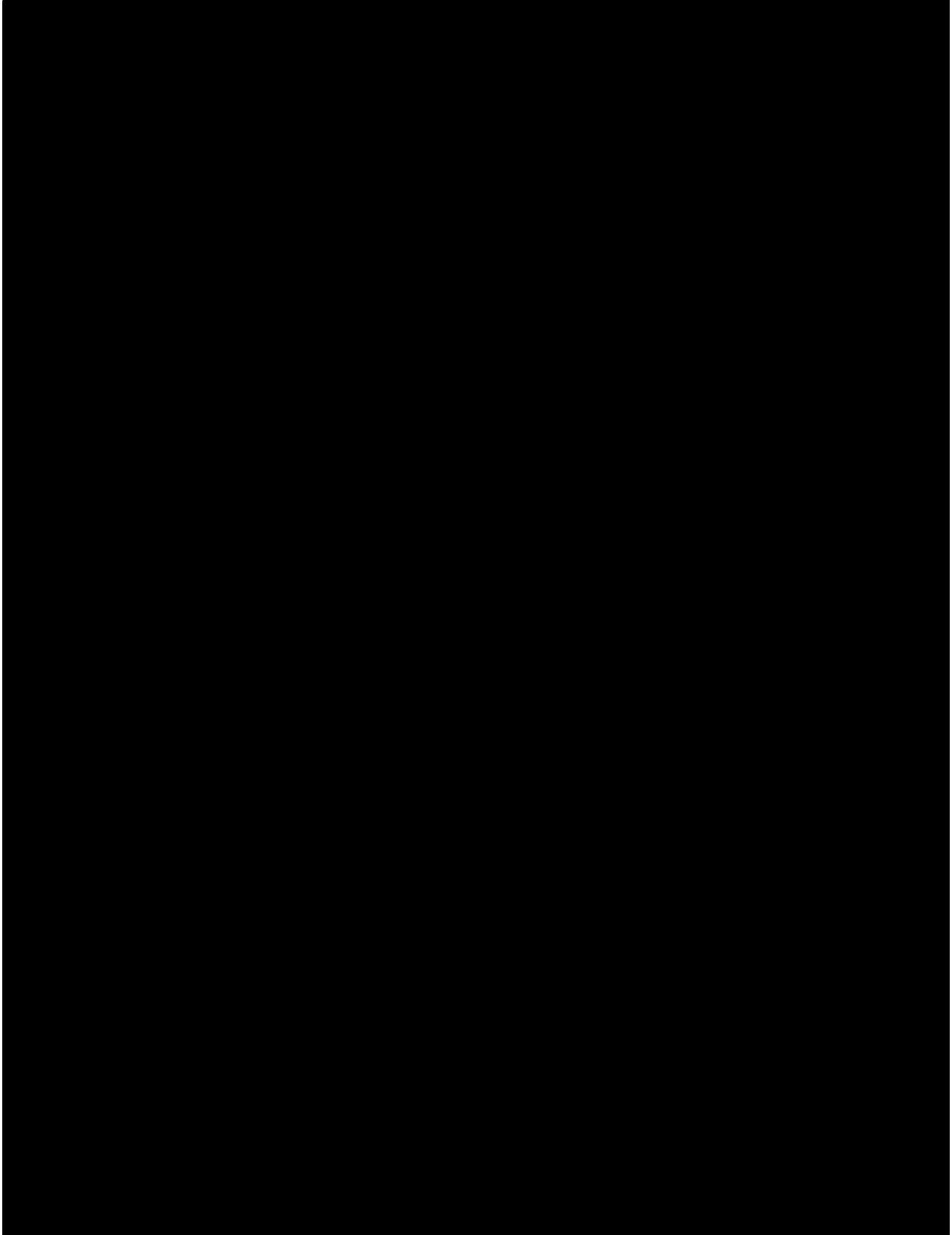
Project Number: BBLLP\_2311\_P0043

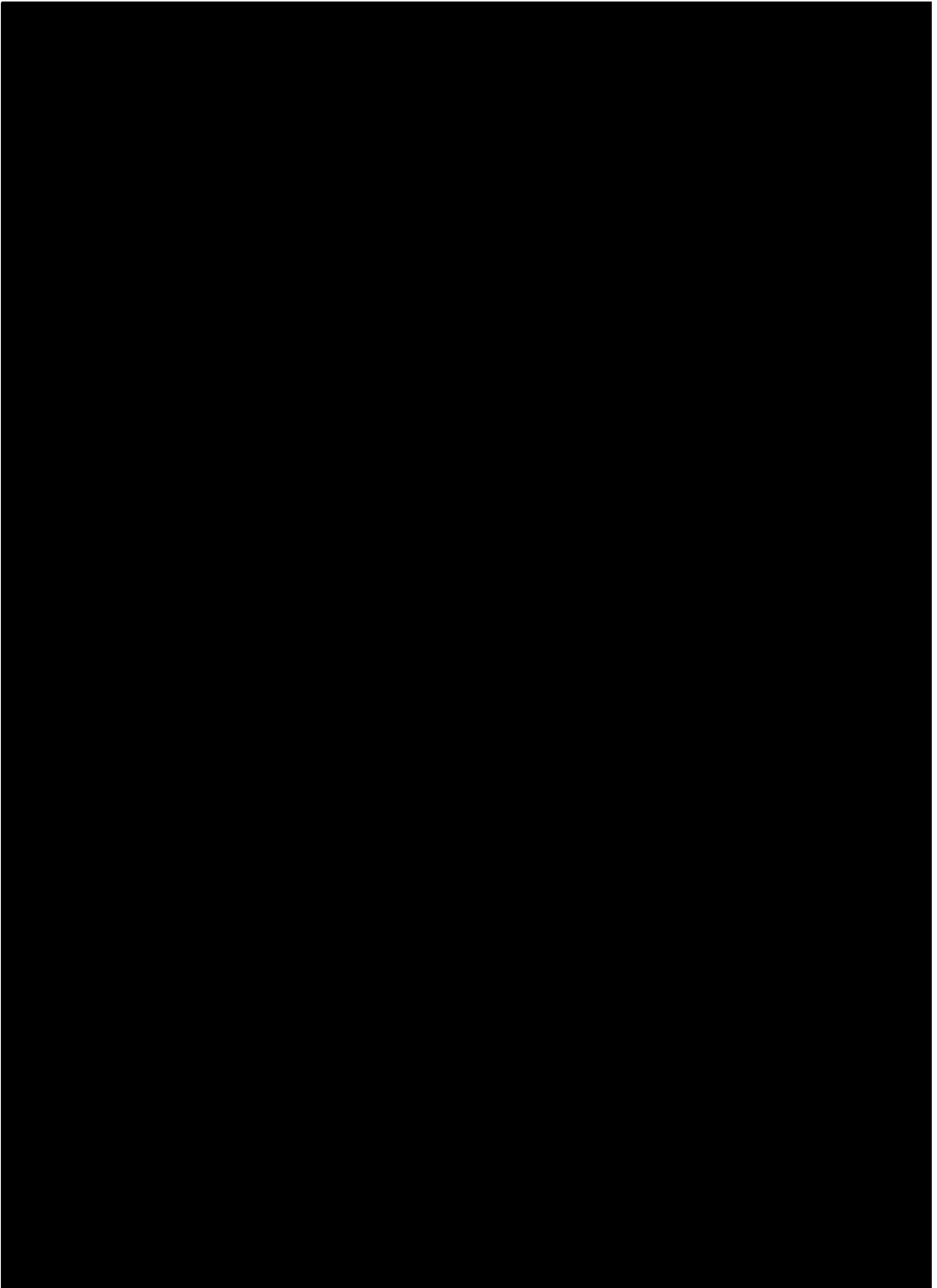
15 W. 37th Street 4th Floor  
New York, NY 10018  
212.581.8870

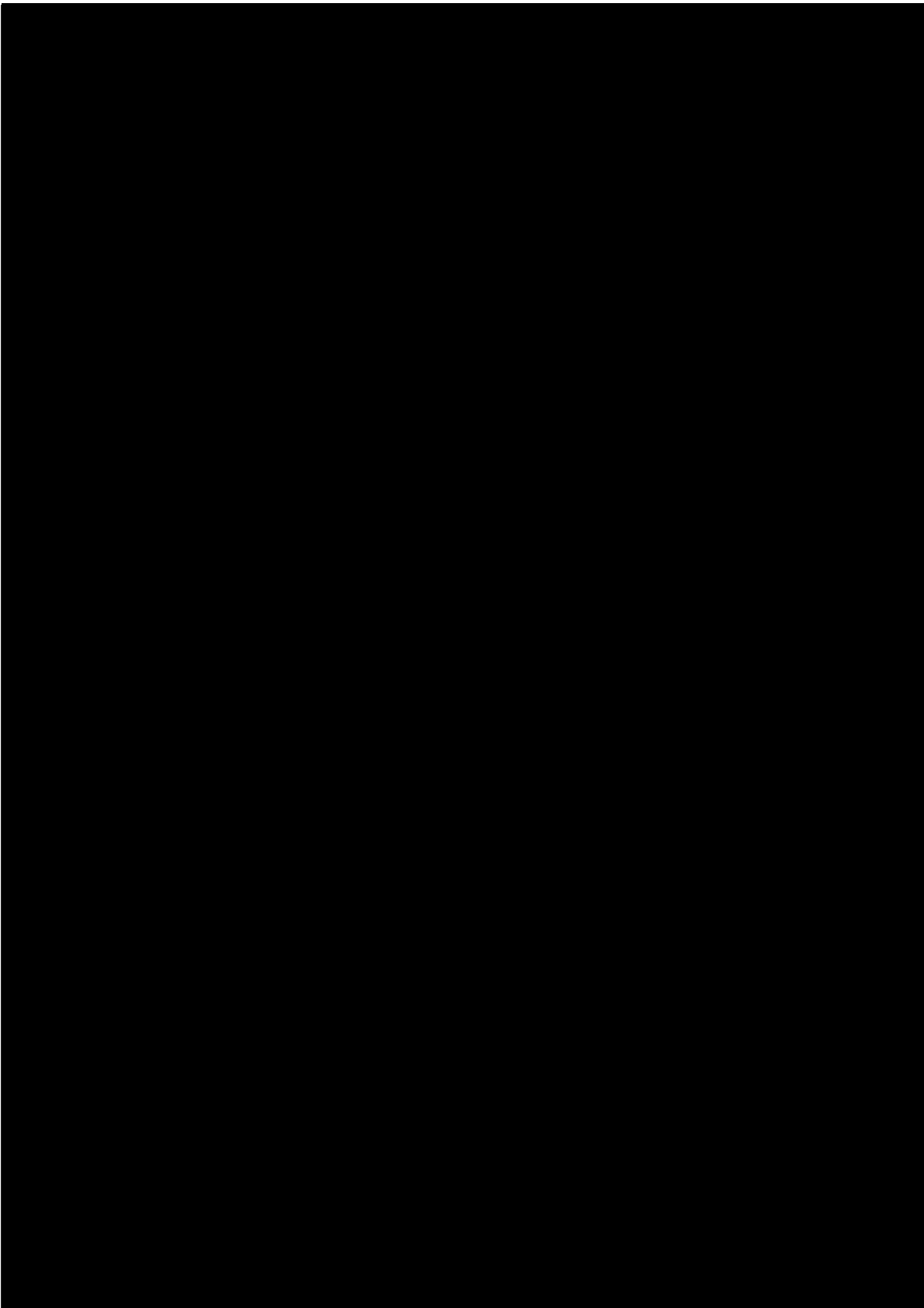


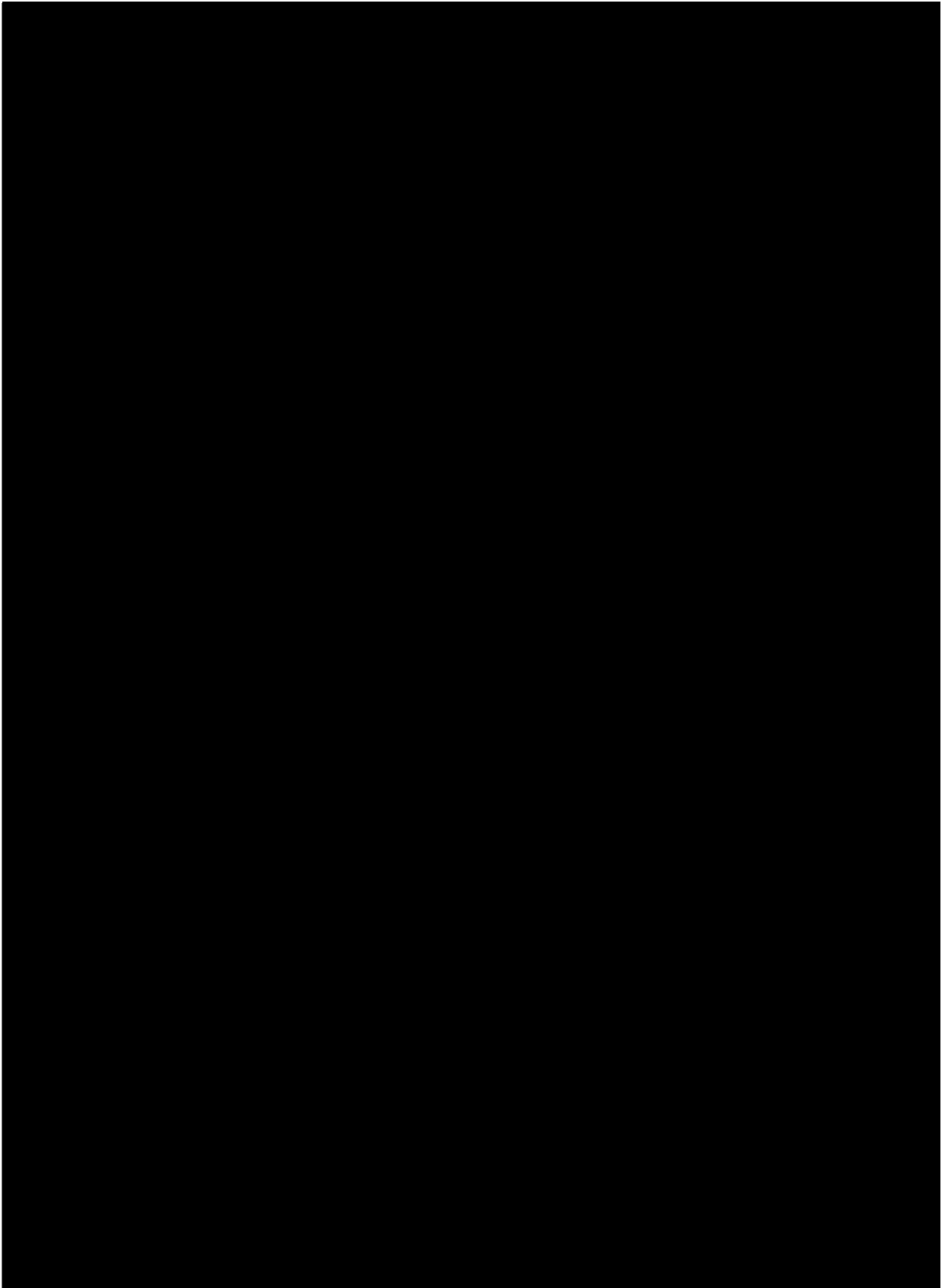


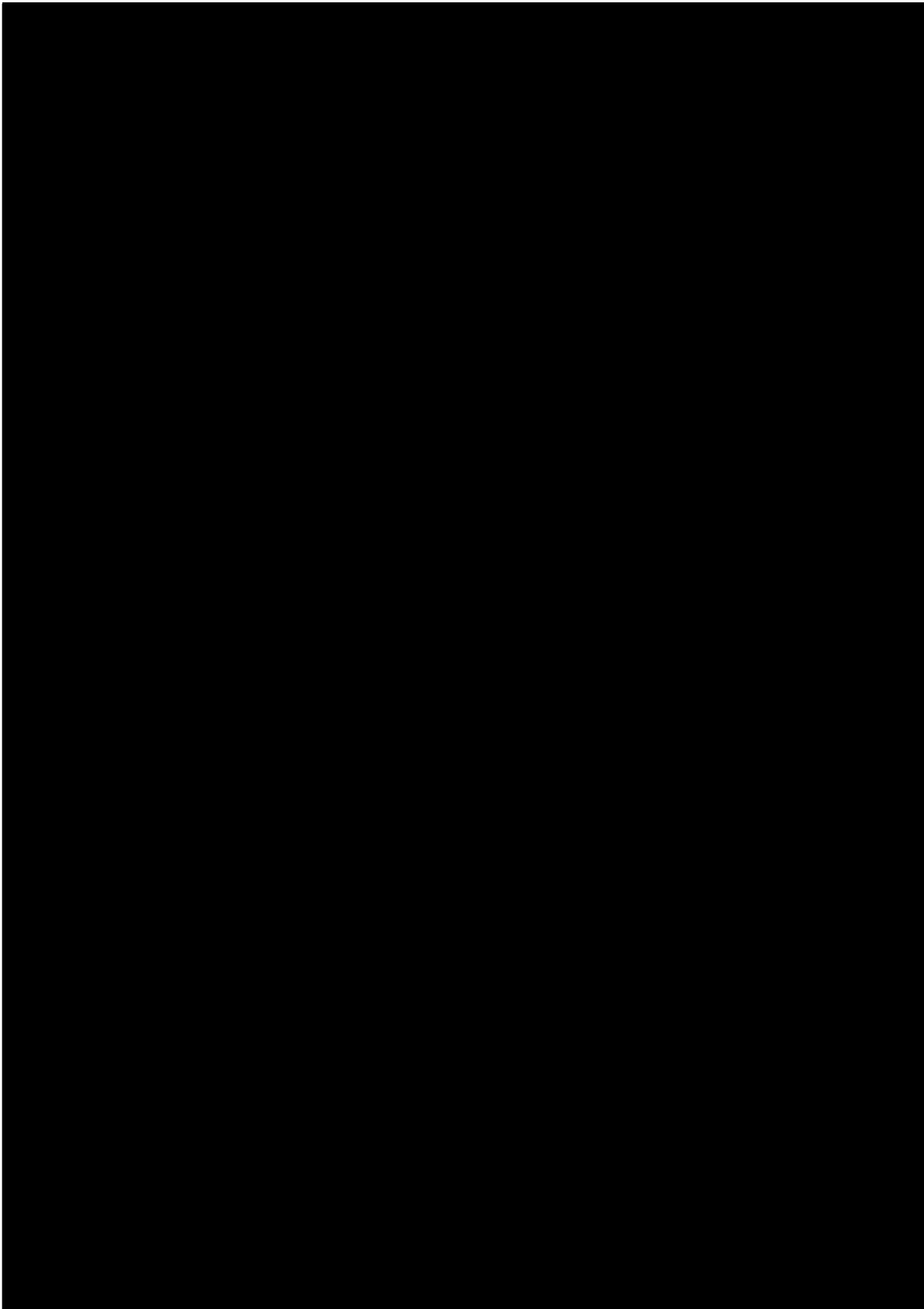


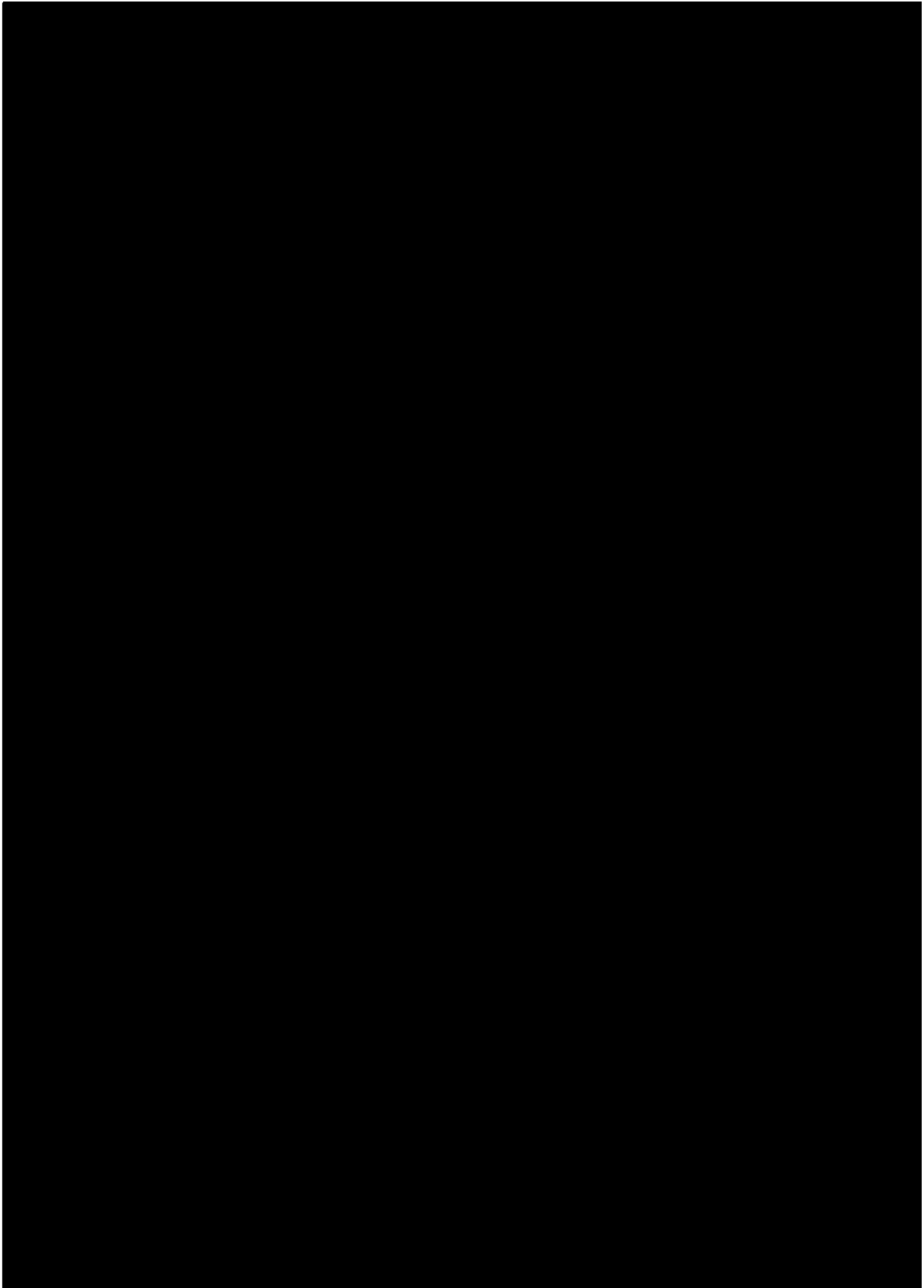




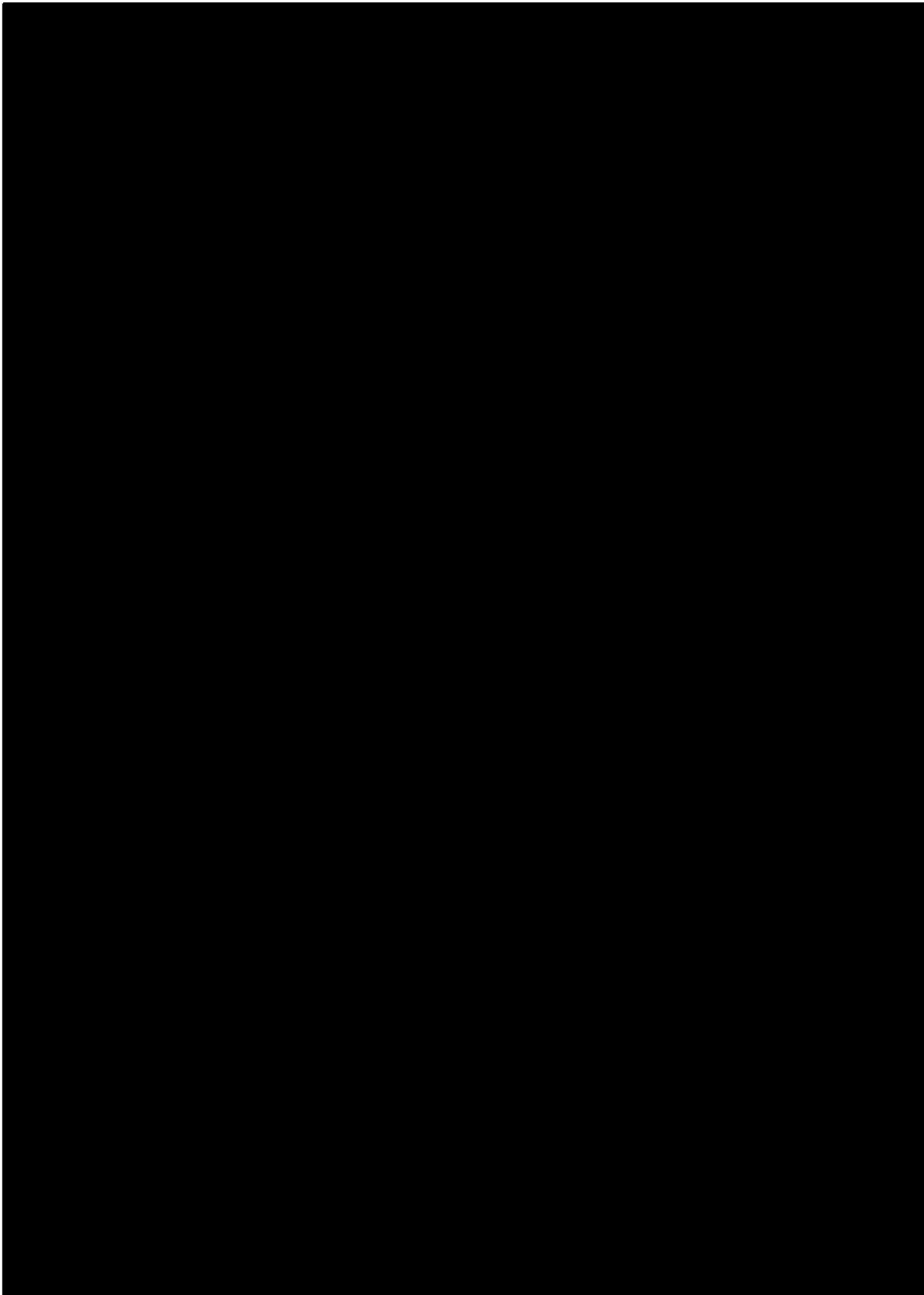


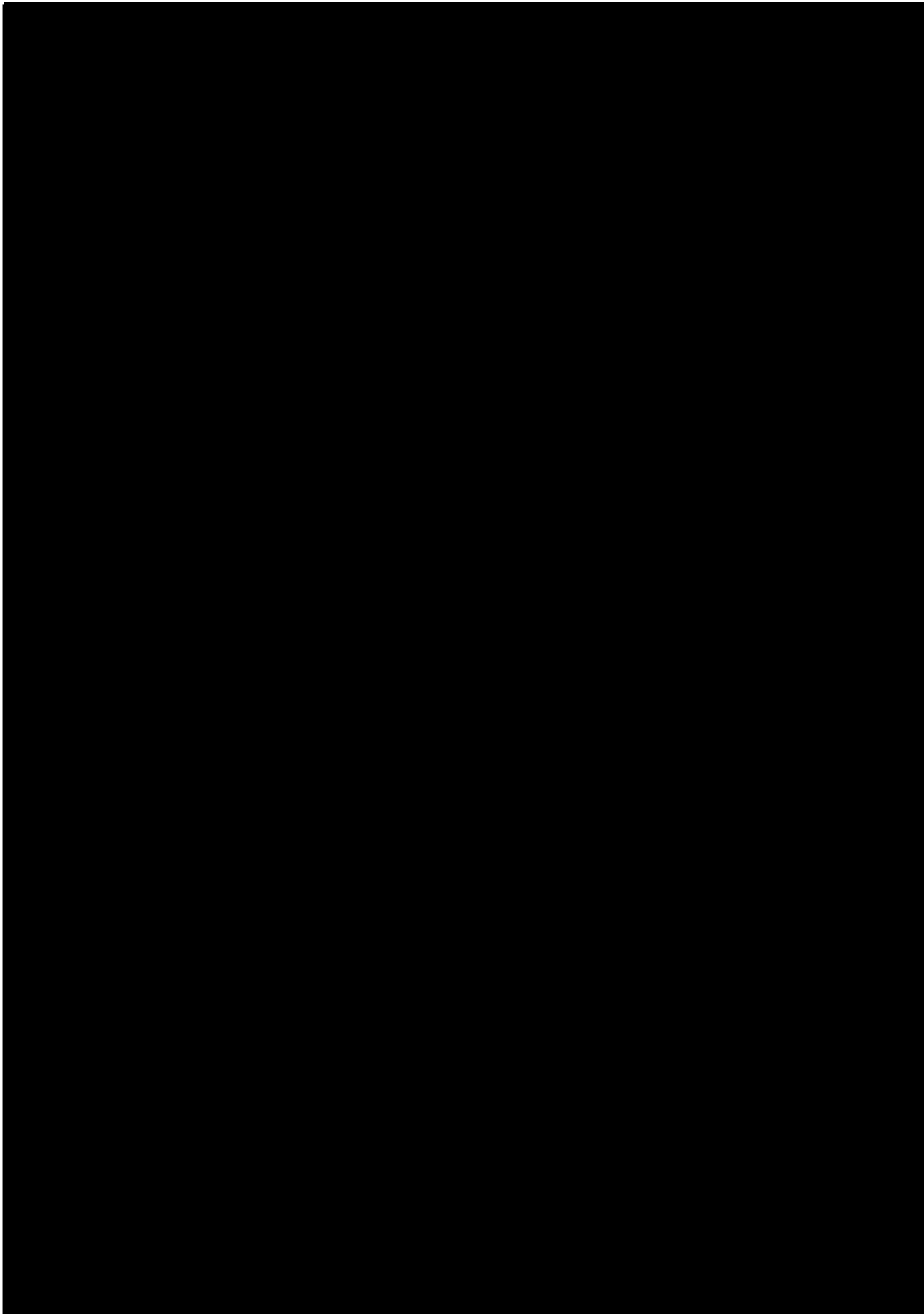


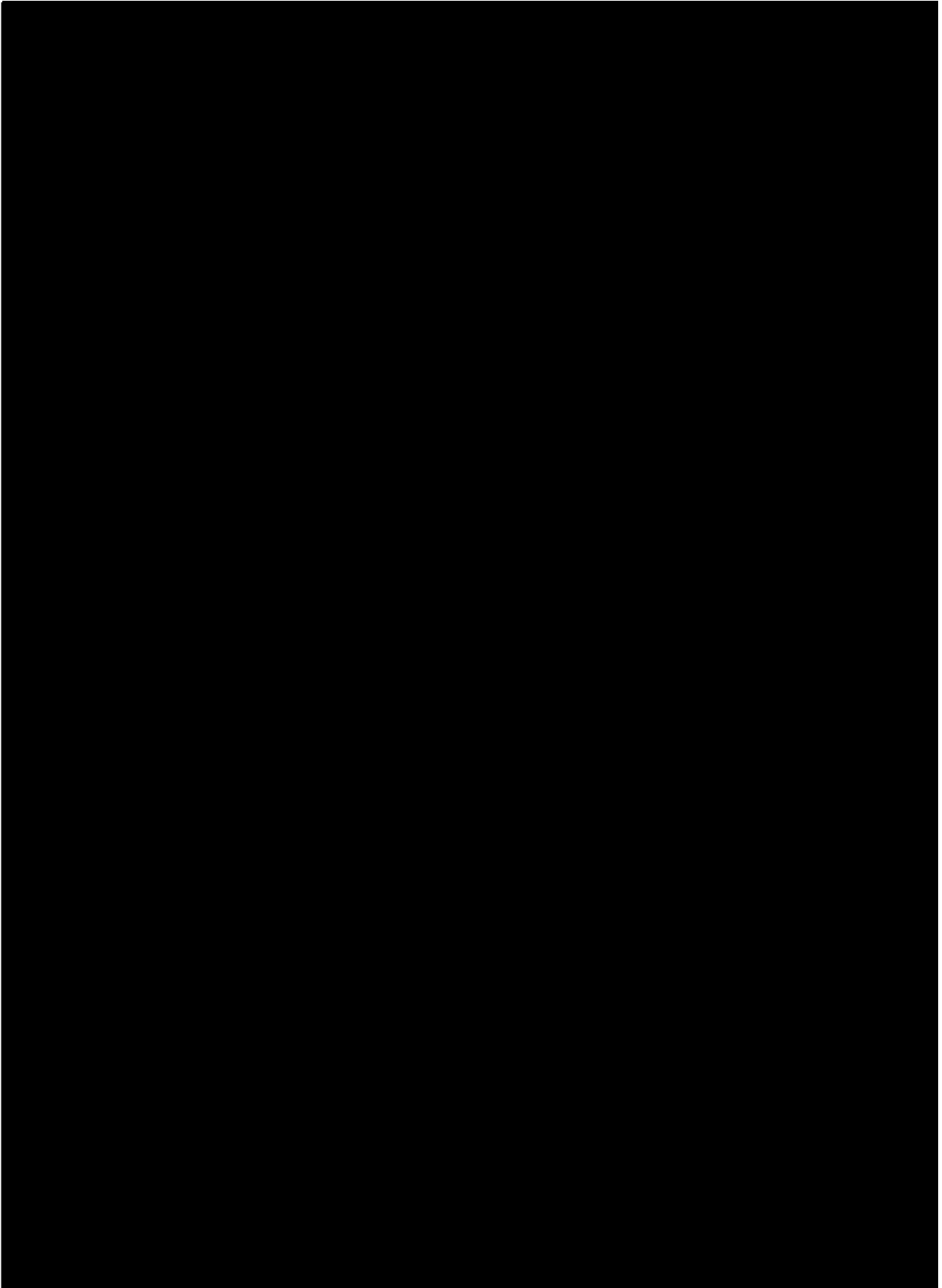


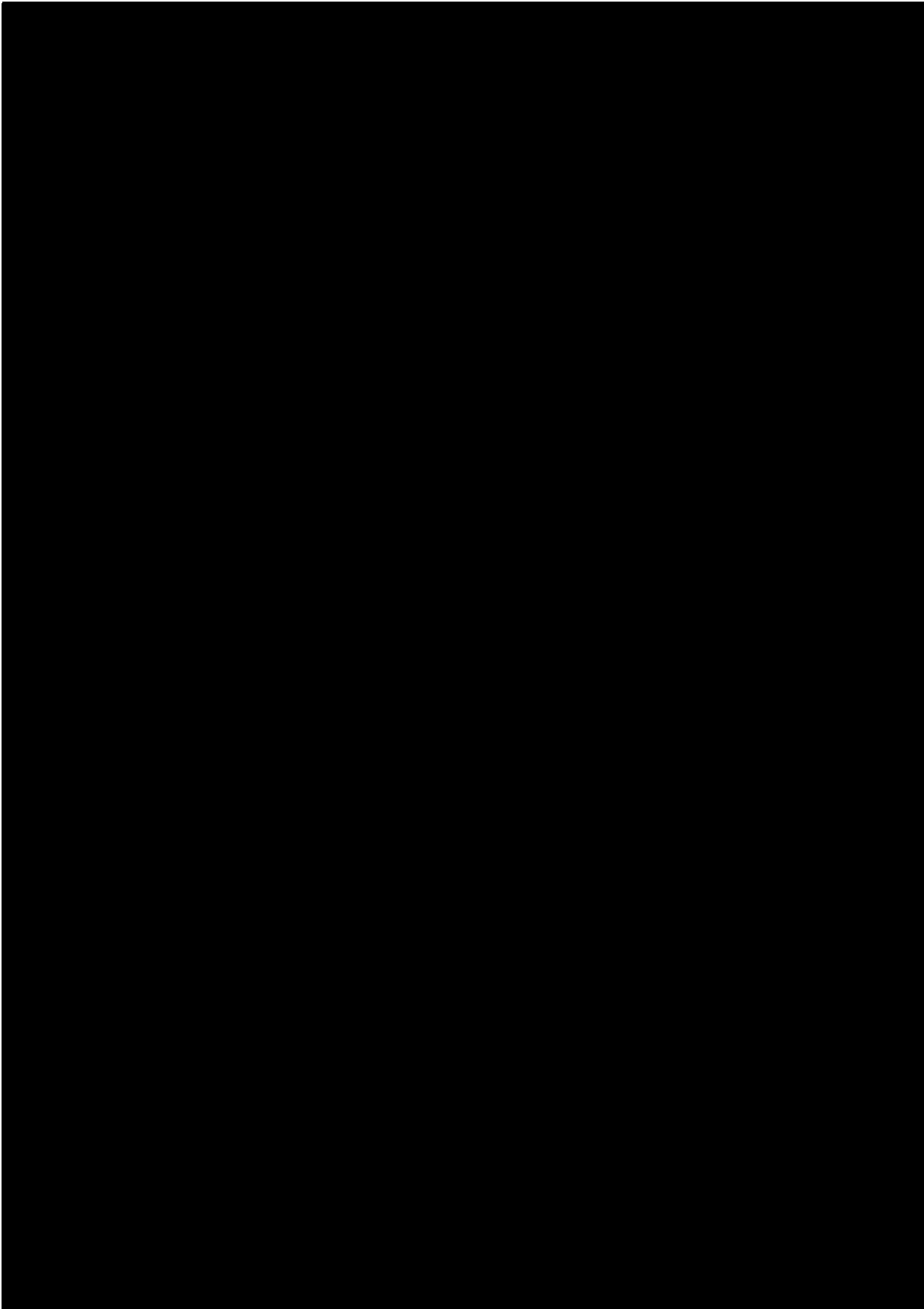


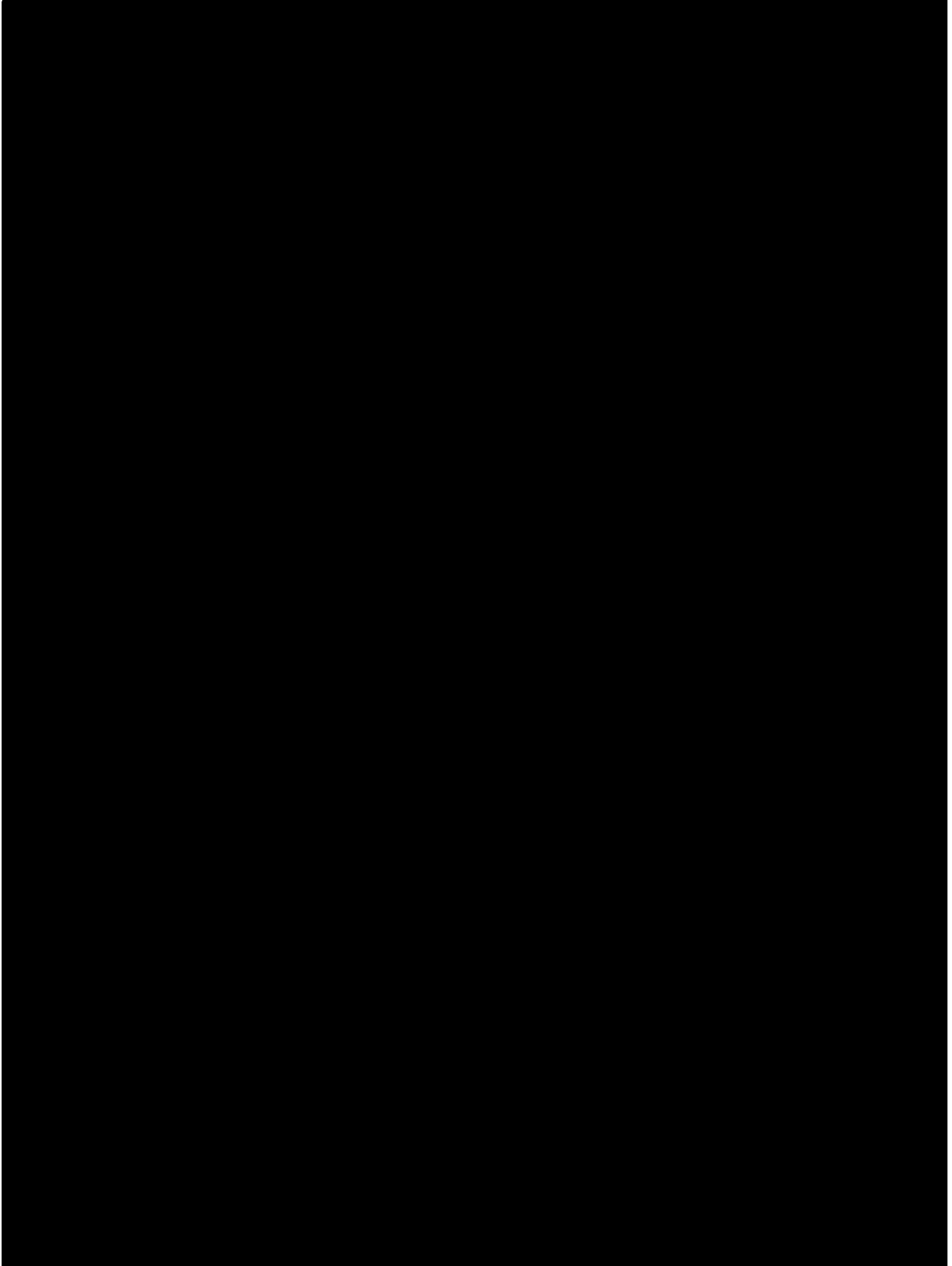


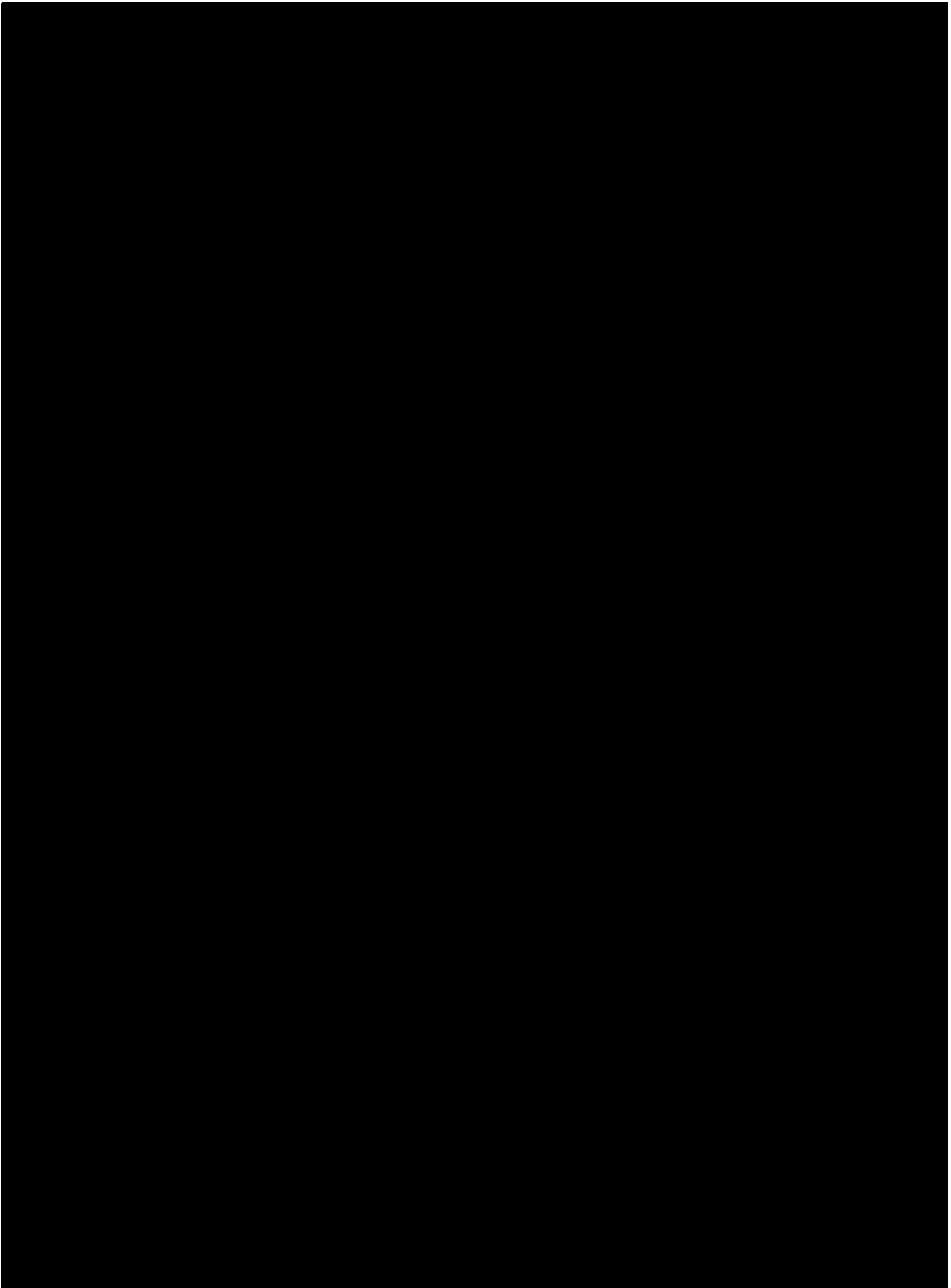


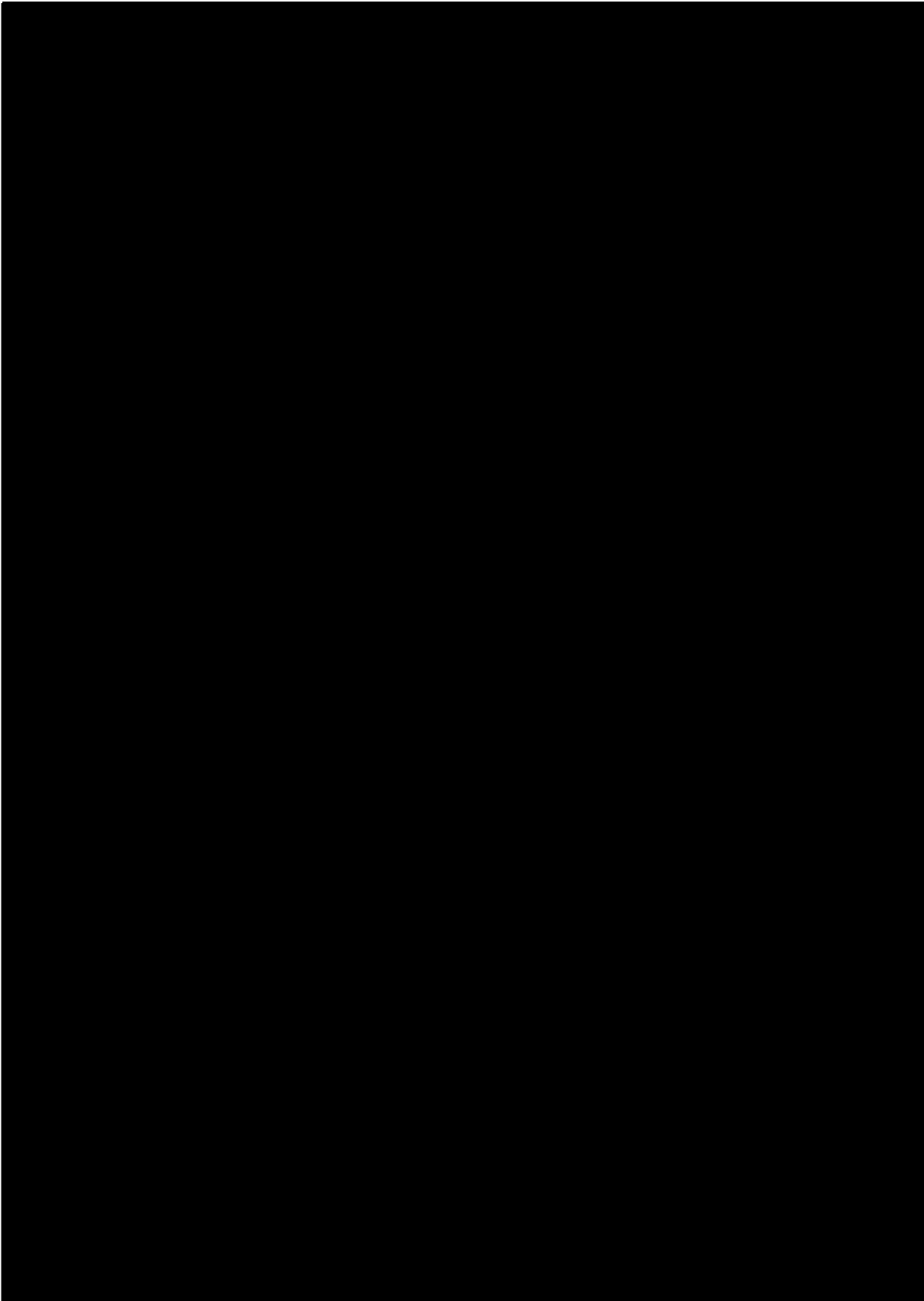


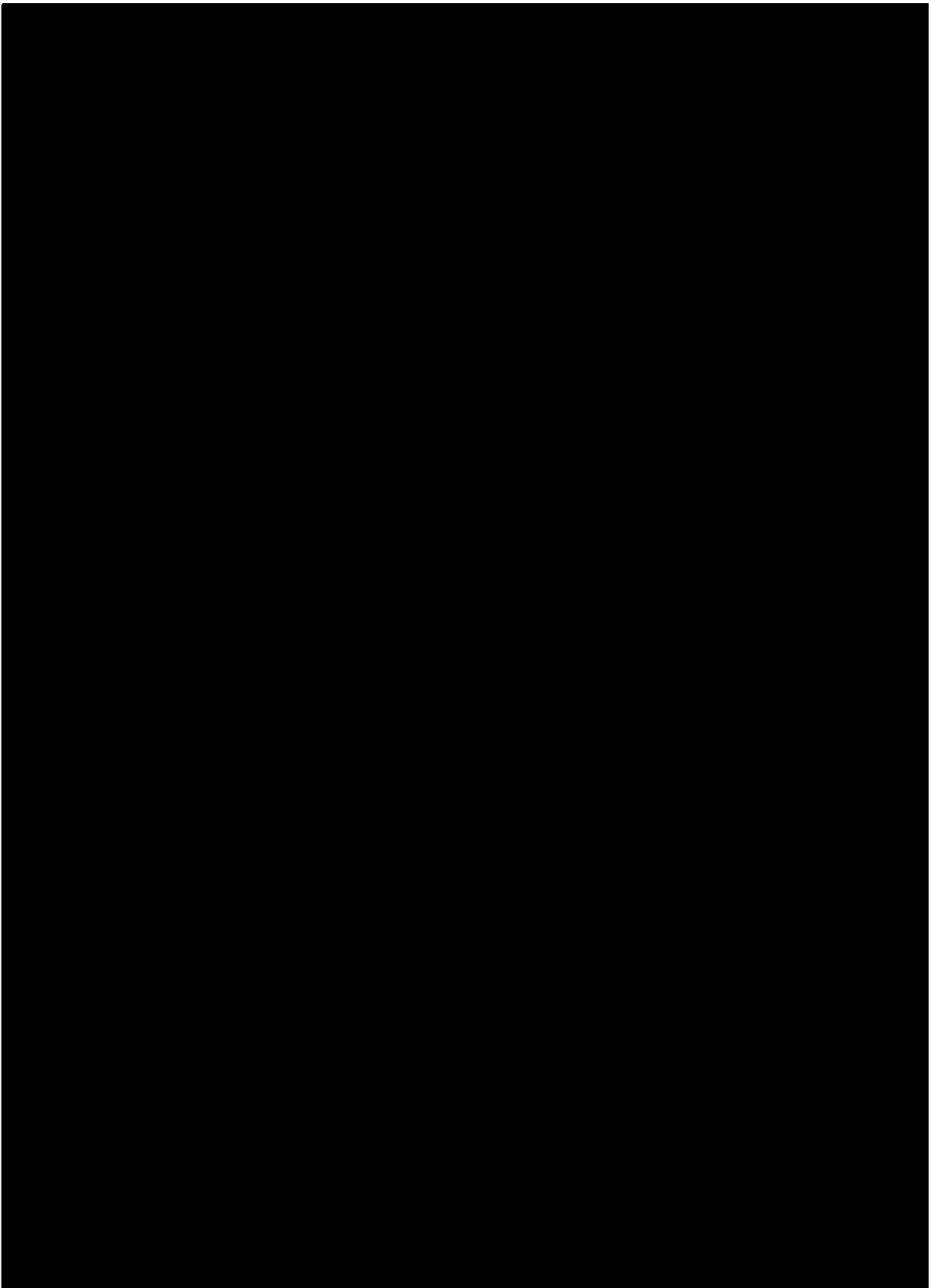




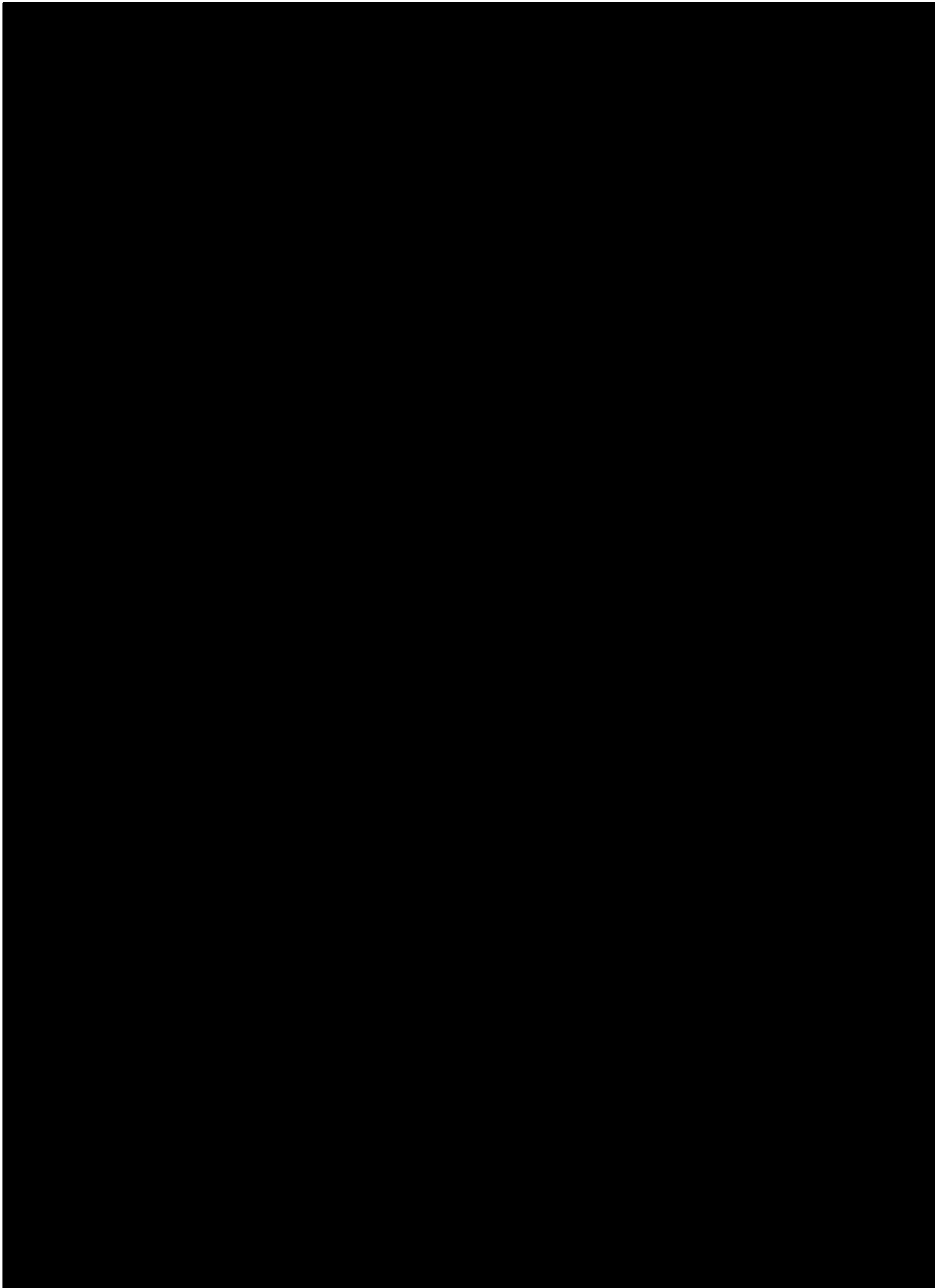


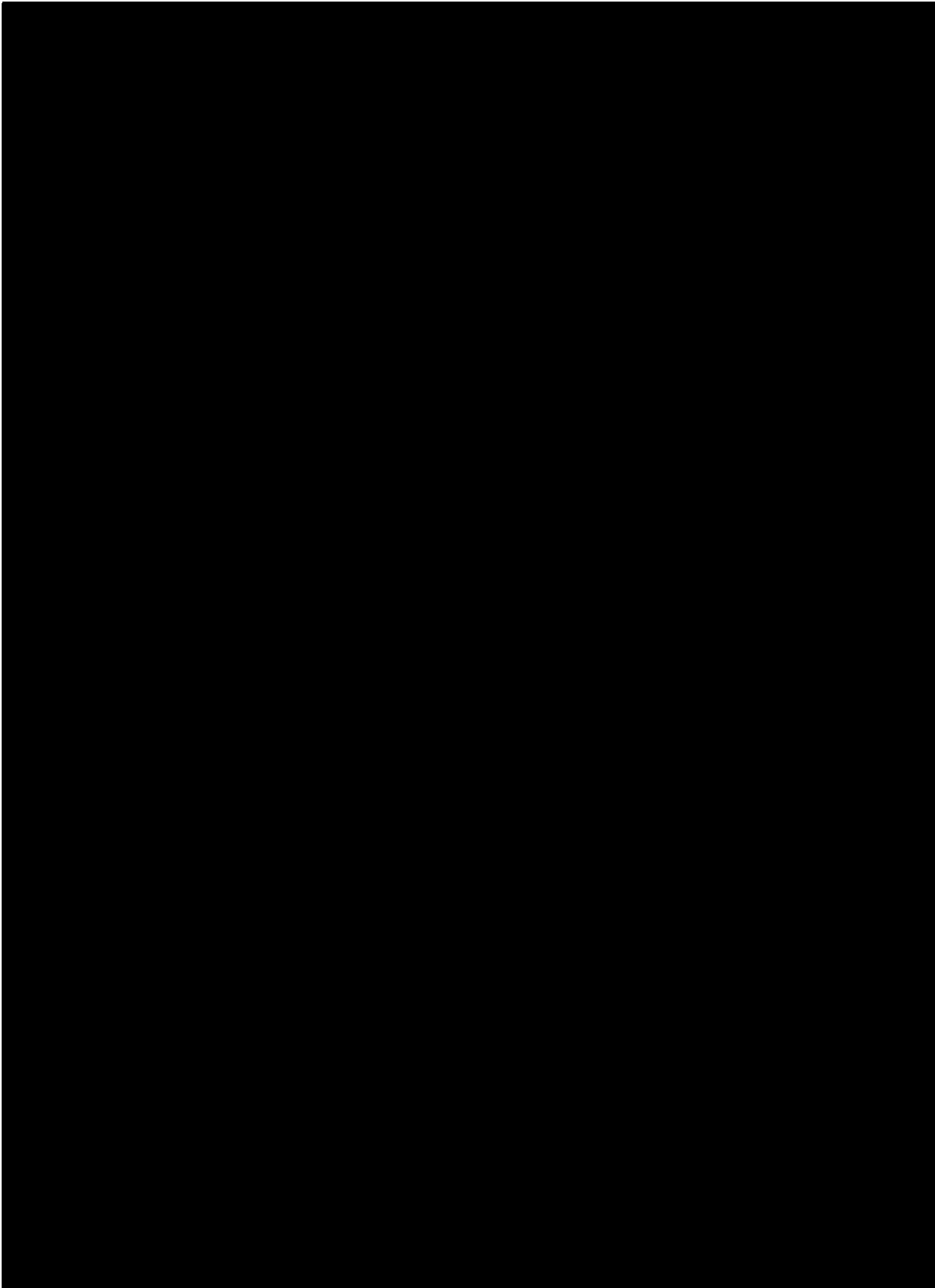


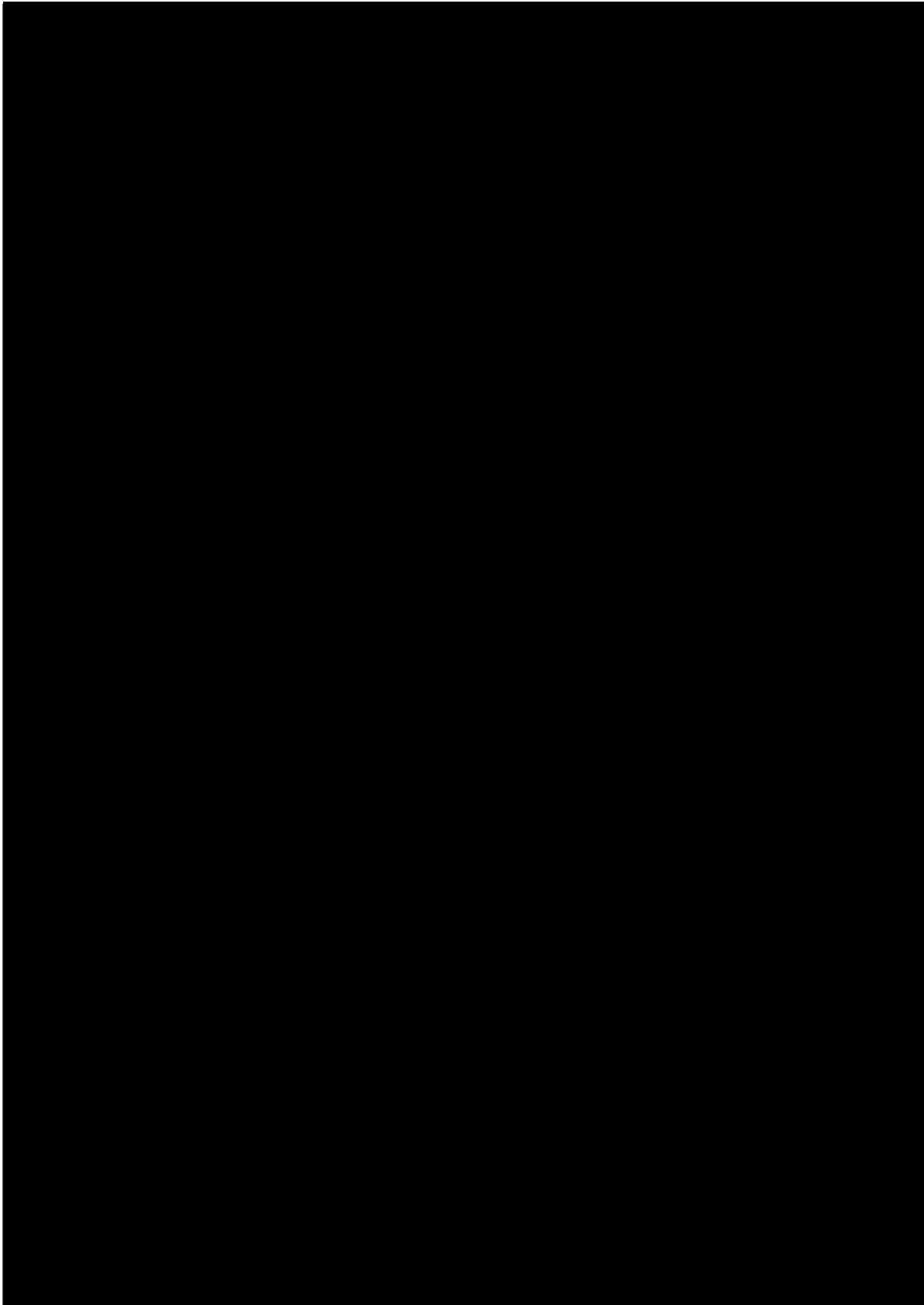


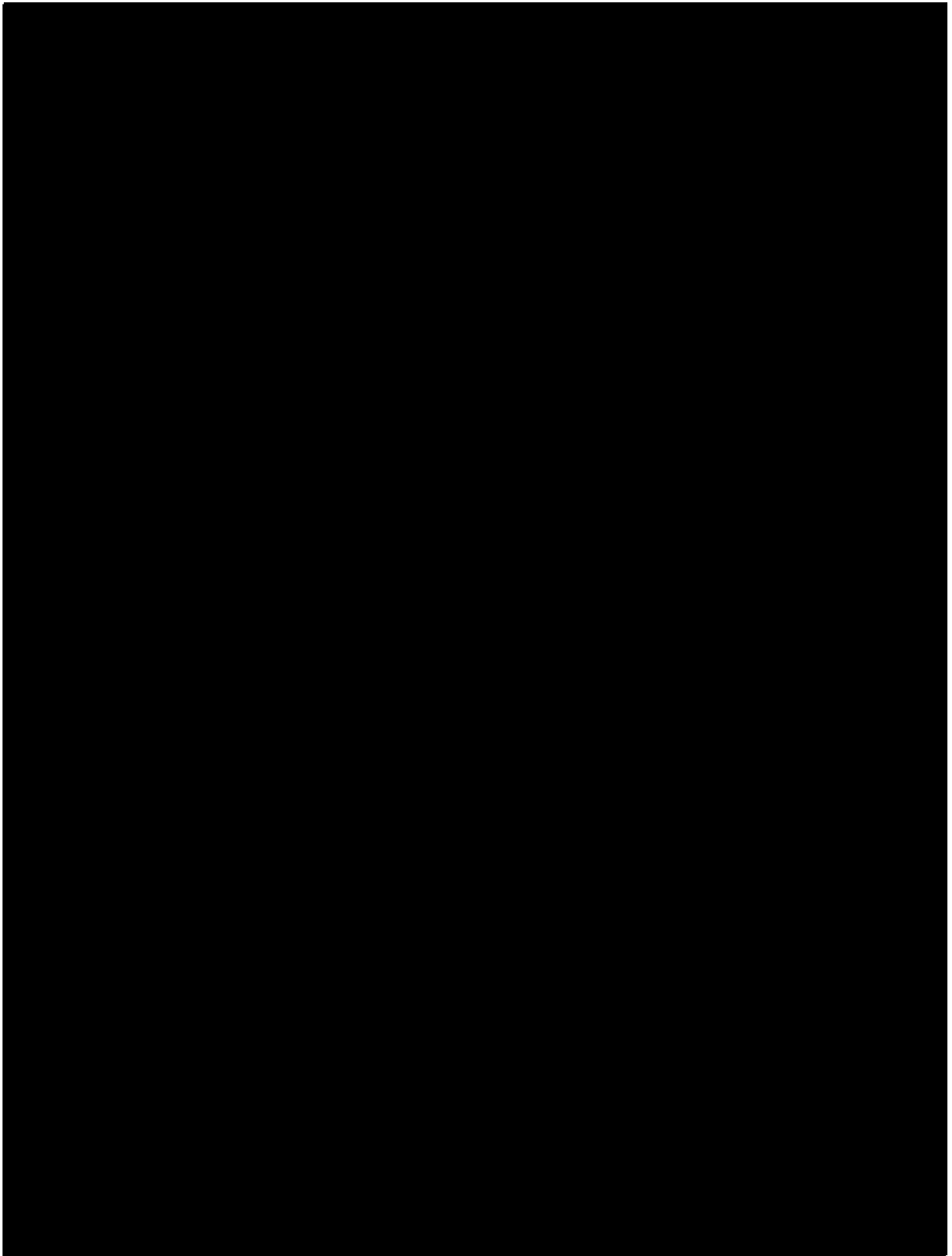


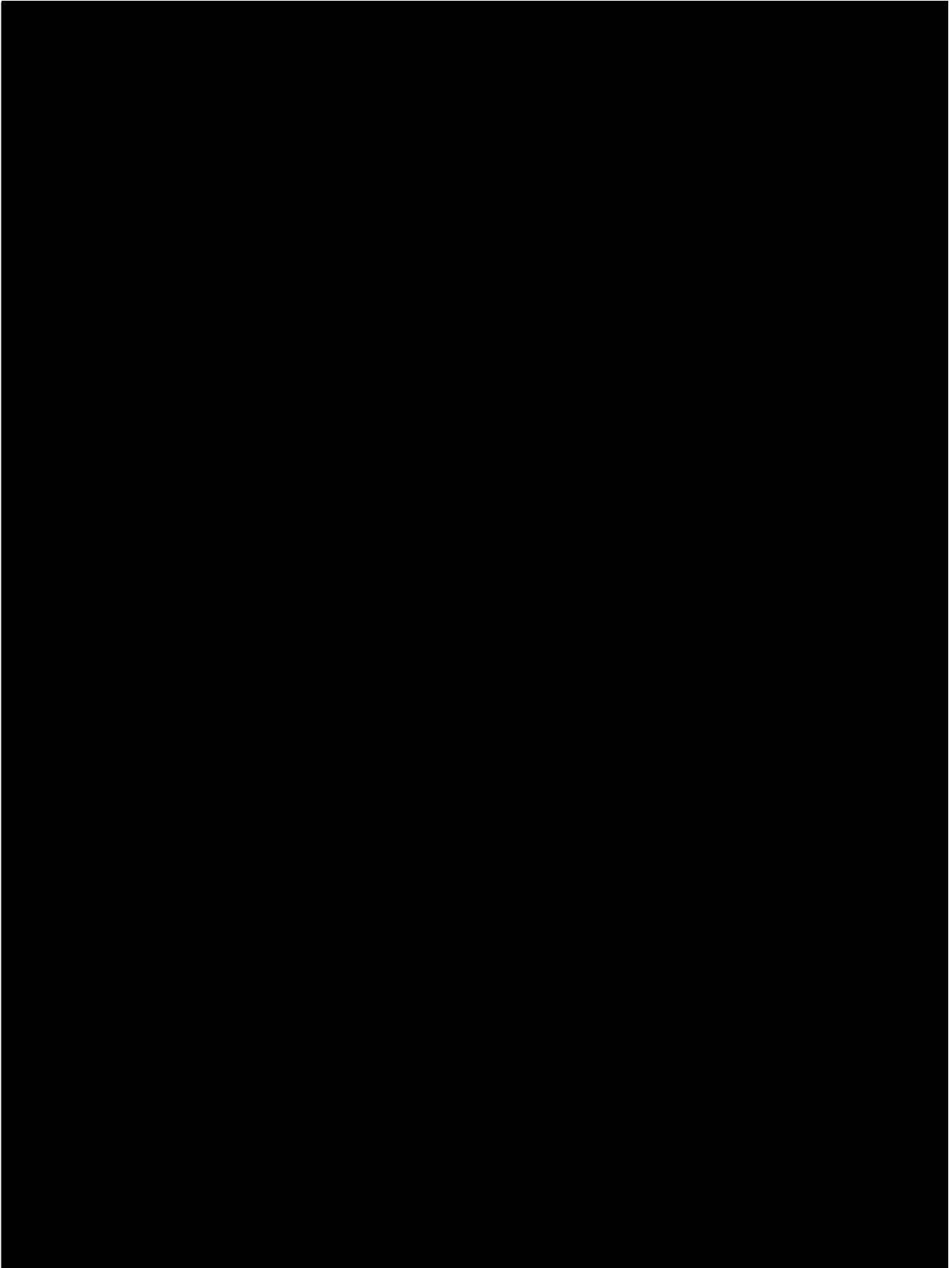


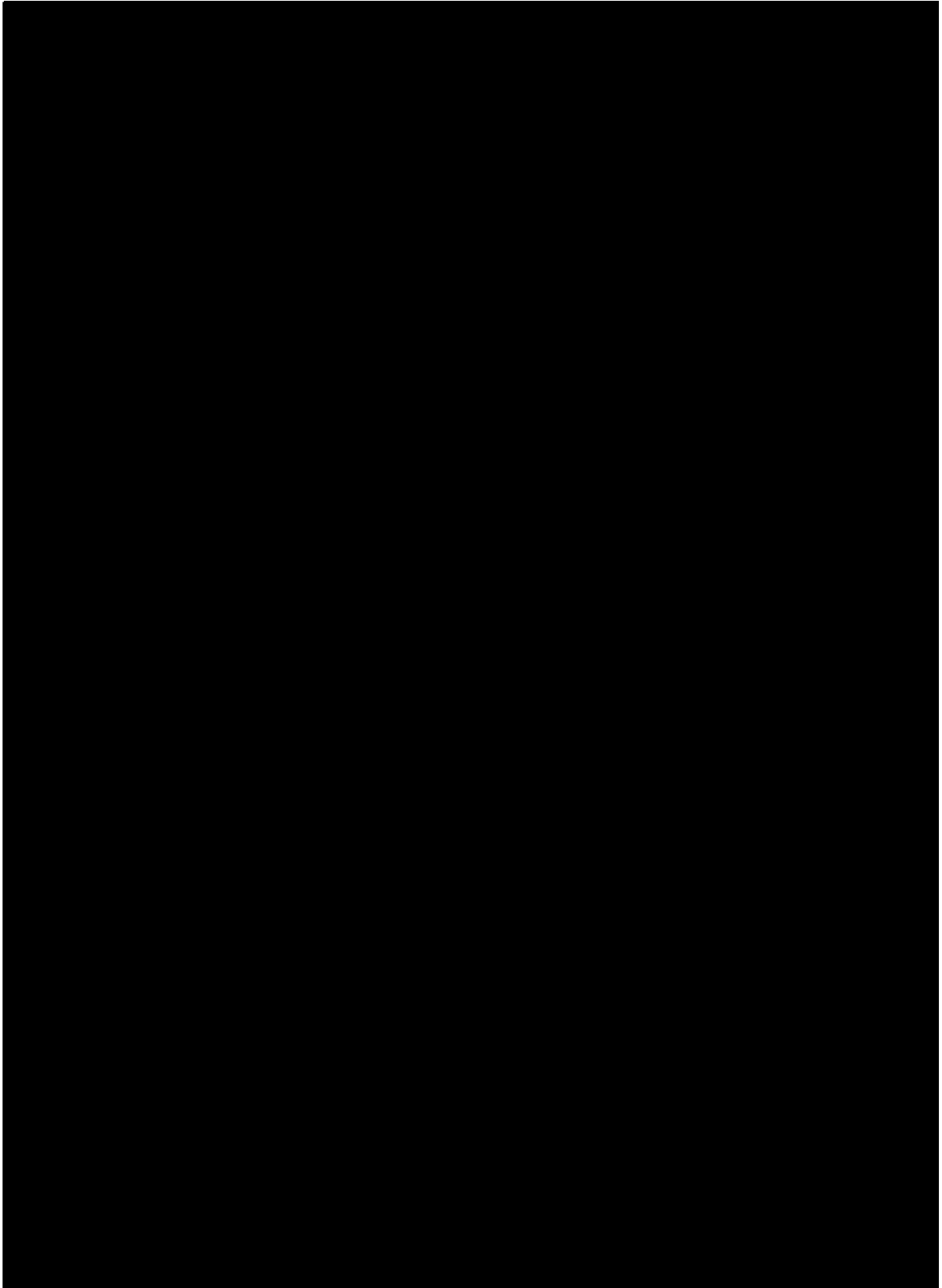


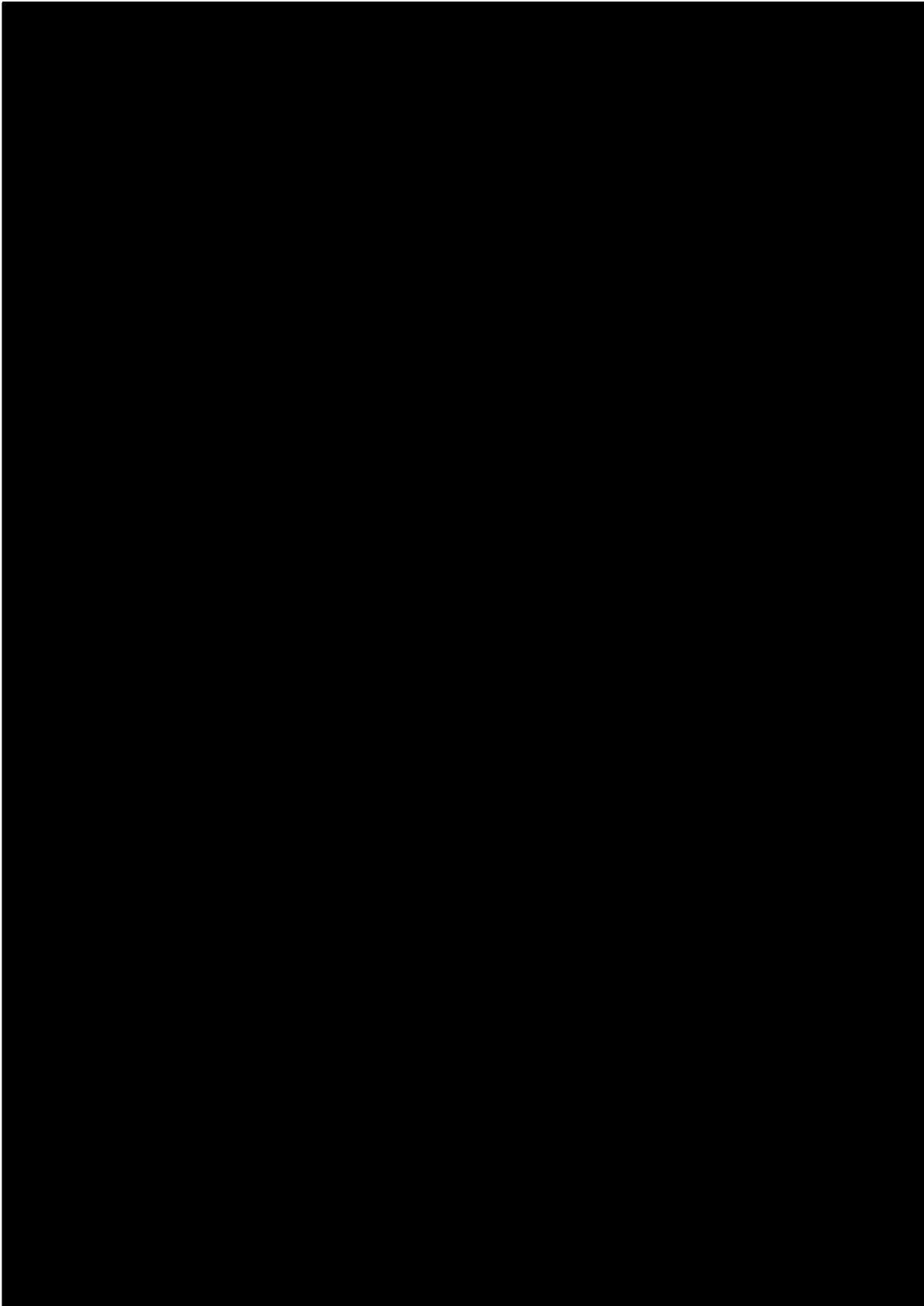


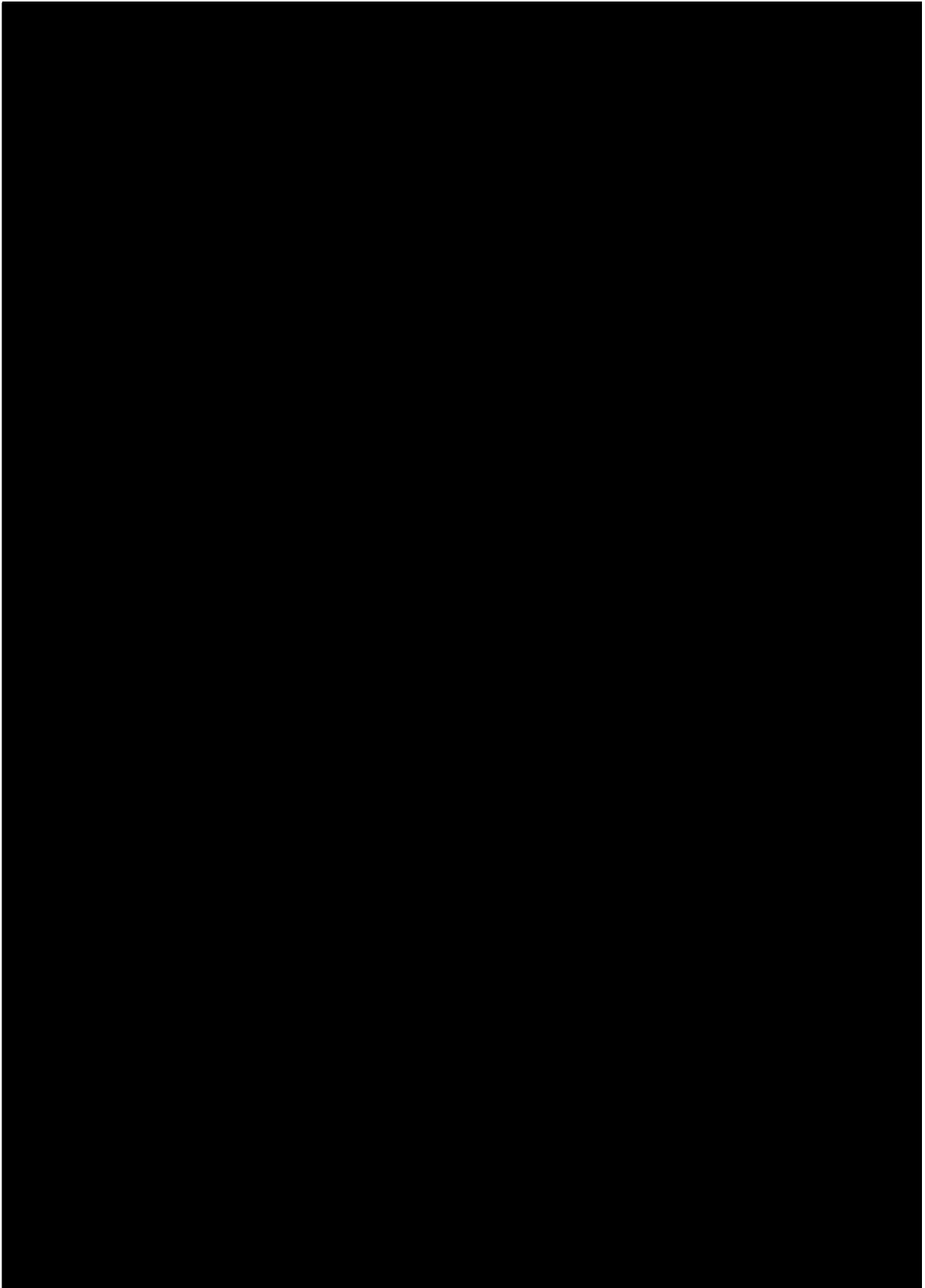




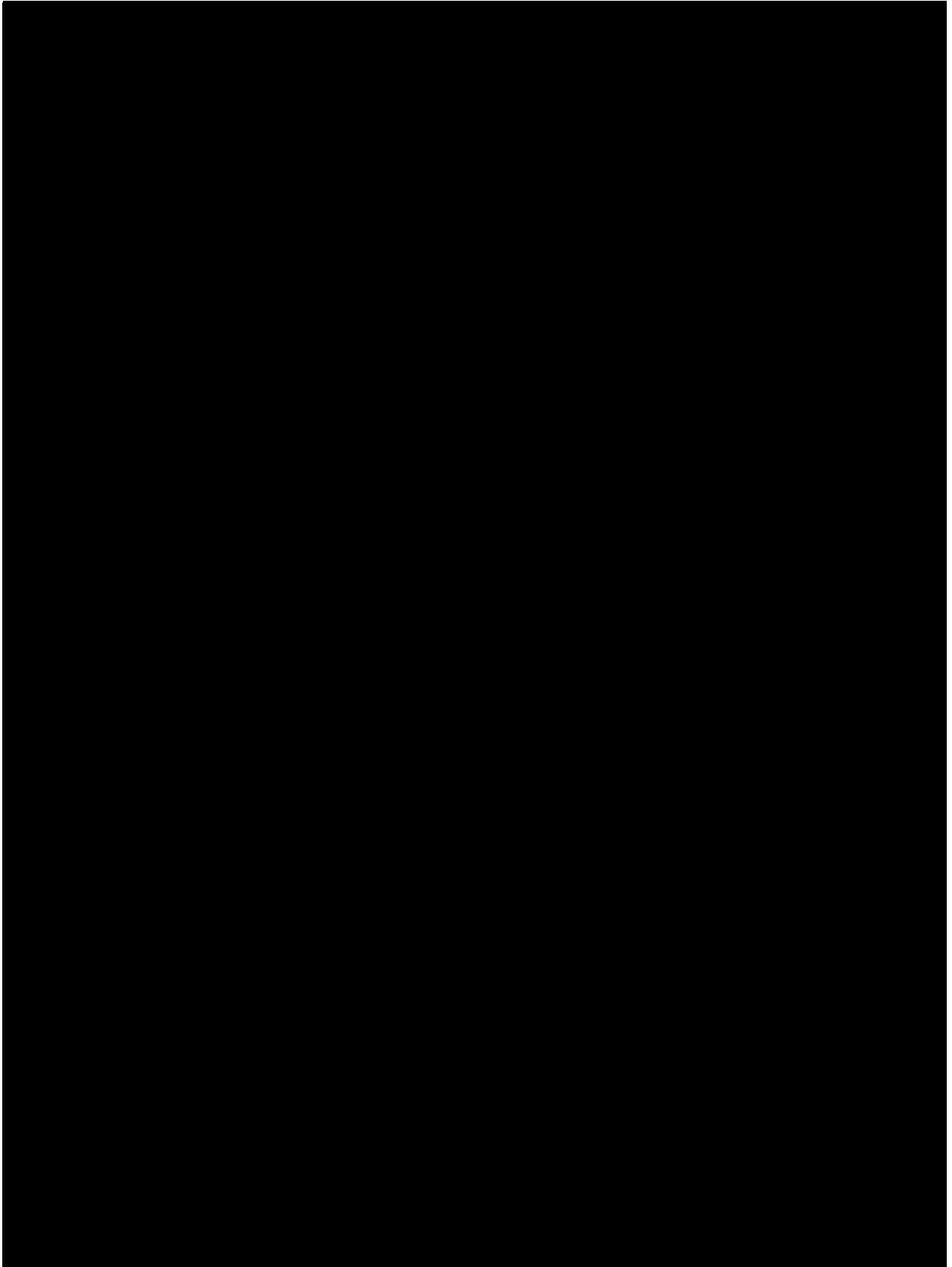


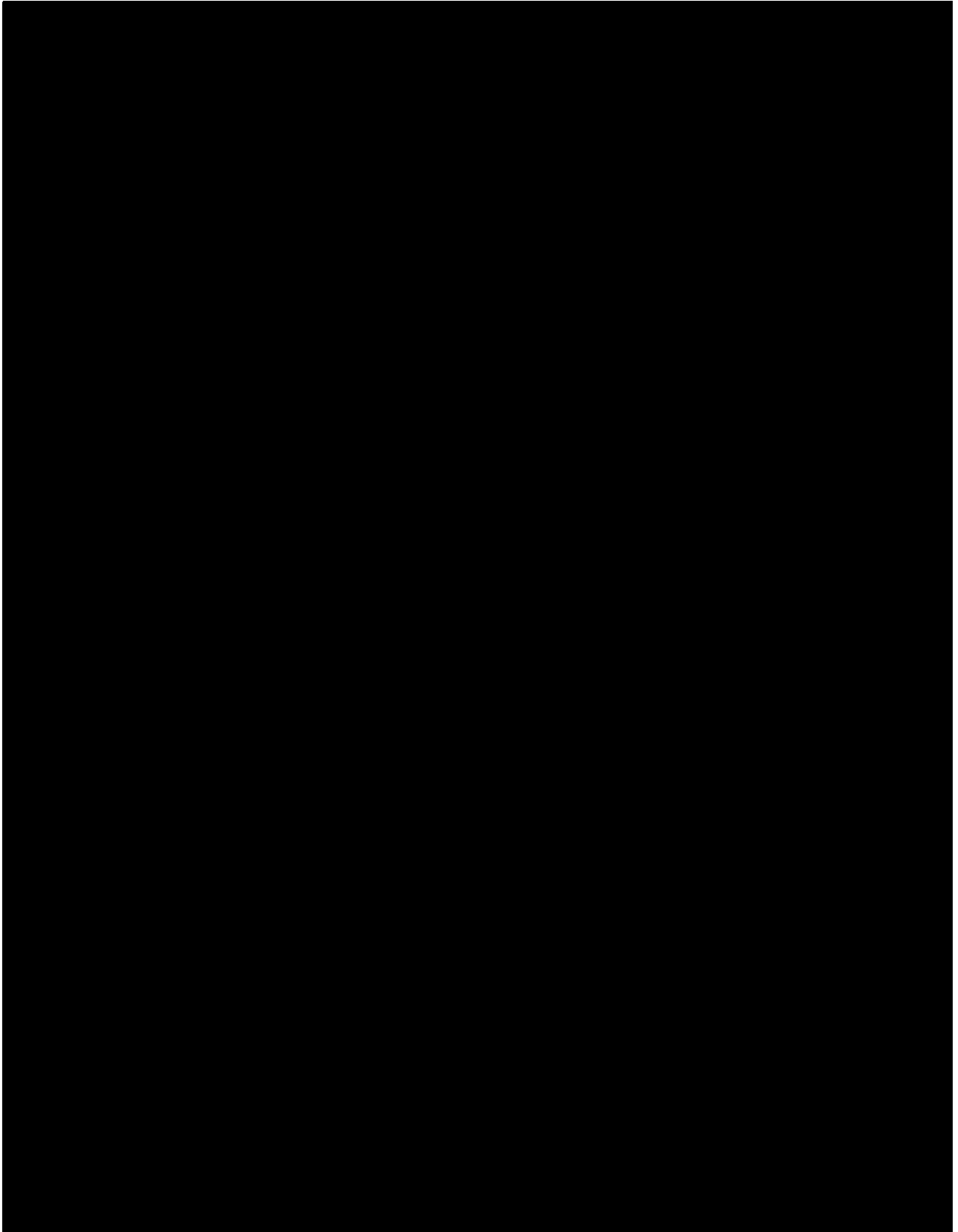


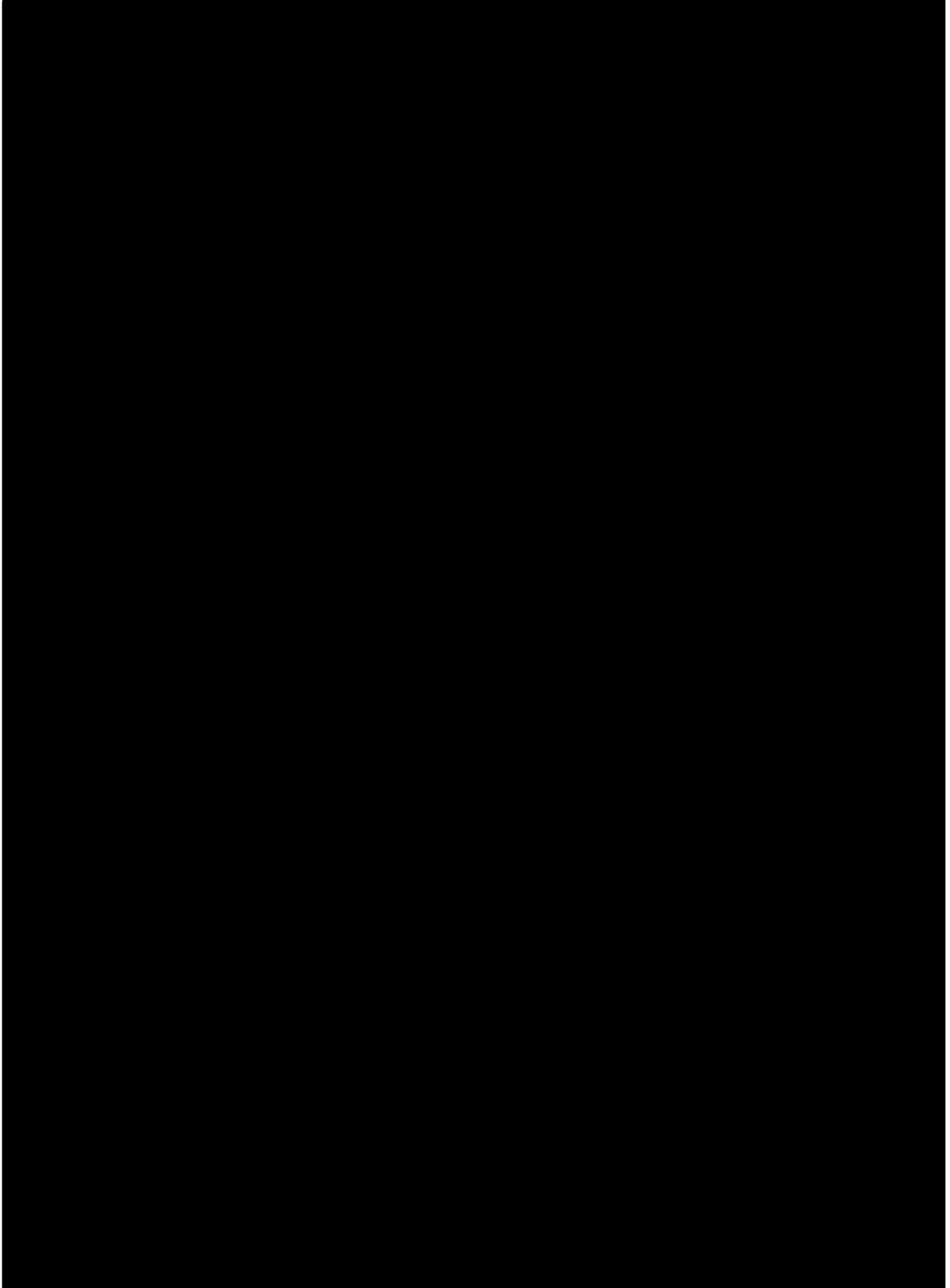


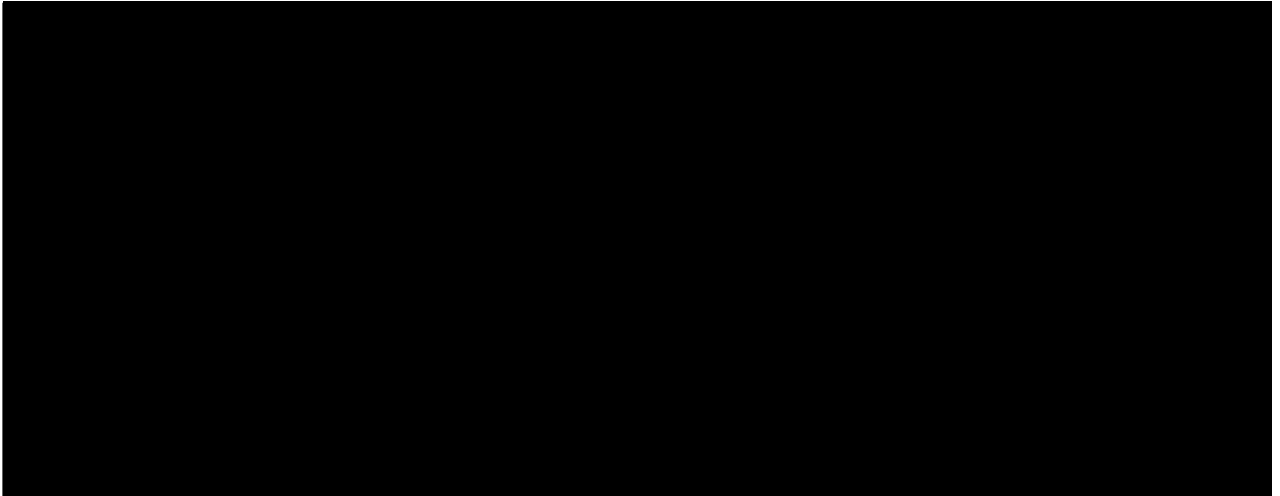














# Attachment C



November 13, 2023

**Certification**

**Welocalize Translations**

**TRANSLATOR'S DECLARATION:**

I, **Johnson Wong**, hereby declare:

That I possess advanced knowledge of the Chinese and English languages. The attached Chinese into English translation has been translated by me and to the best of my knowledge and belief, it is a true and accurate translation of the document with bates number: IRI-SU-001423

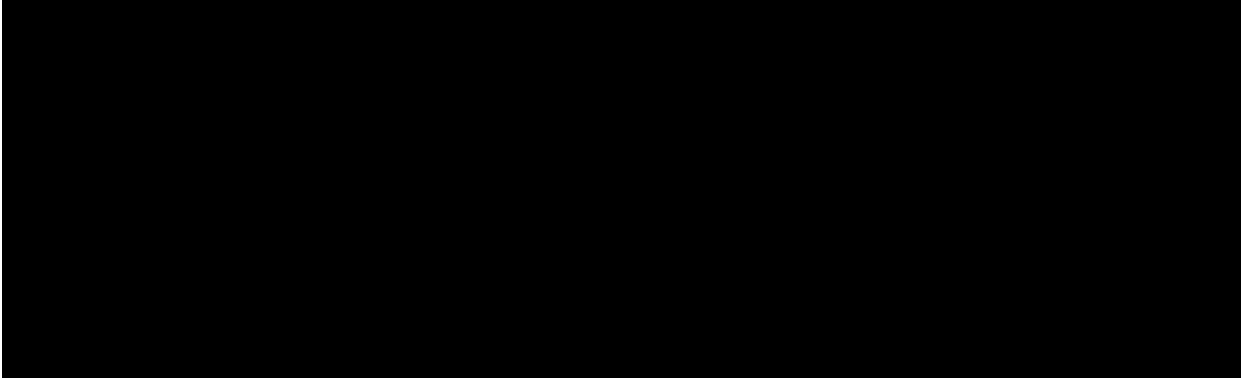
*(Digital or printed signature here above the line)*

A handwritten signature in black ink, appearing to read "J. Wong", written over a horizontal line.

**Johnson Wong**

Project Number: BBLLP\_2311\_P0043

15 W. 37th Street 4th Floor  
New York, NY 10018  
212.581.8870









# Attachment D



November 13, 2023

**Certification**

**Welocalize Translations**

**TRANSLATOR'S DECLARATION:**

I, **Johnson Wong**, hereby declare:

That I possess advanced knowledge of the Chinese and English languages. The attached Chinese into English translation has been translated by me and to the best of my knowledge and belief, it is a true and accurate translation of the document with bates number: IRI-SU-001446

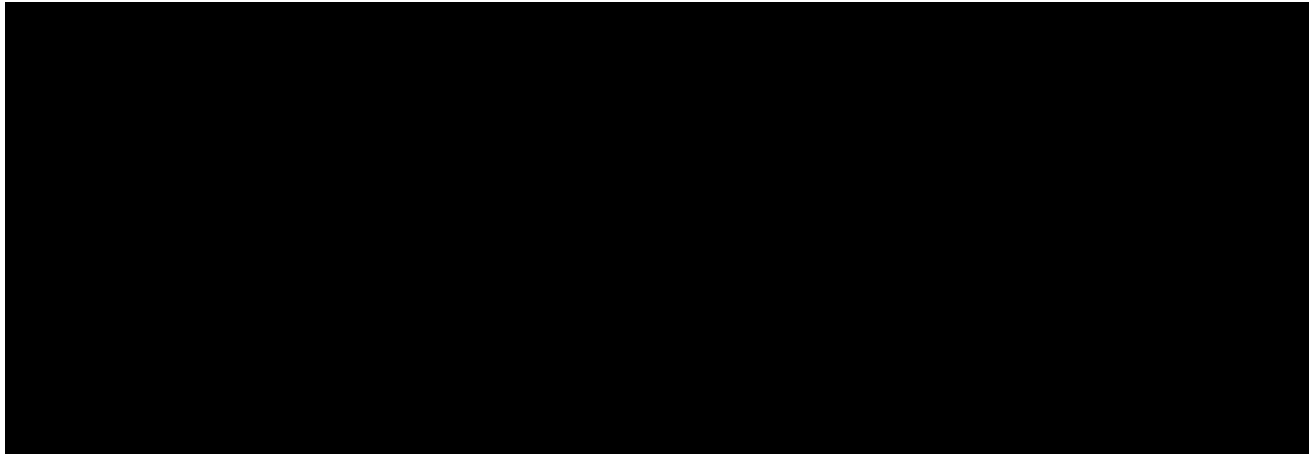
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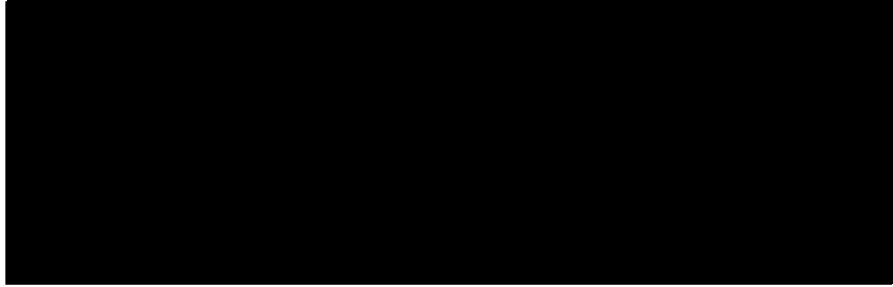
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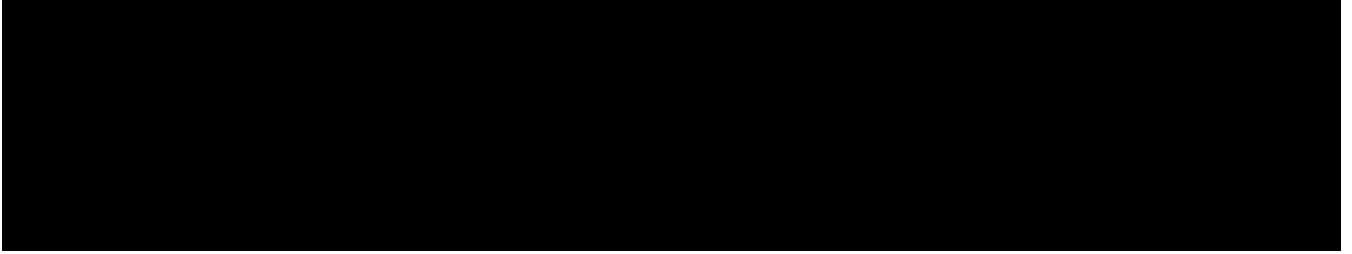
**Johnson Wong**

Project Number: BBLLP\_2311\_P0043

15 W. 37th Street 4th Floor  
New York, NY 10018  
212.581.8870







# Attachment E





November 13, 2023

**Certification**

**Welocalize Translations**

**TRANSLATOR'S DECLARATION:**

I, **Johnson Wong**, hereby declare:

That I possess advanced knowledge of the Chinese and English languages. The attached Chinese into English translation has been translated by me and to the best of my knowledge and belief, it is a true and accurate translation of the document with bates number: IRI-SU-000400

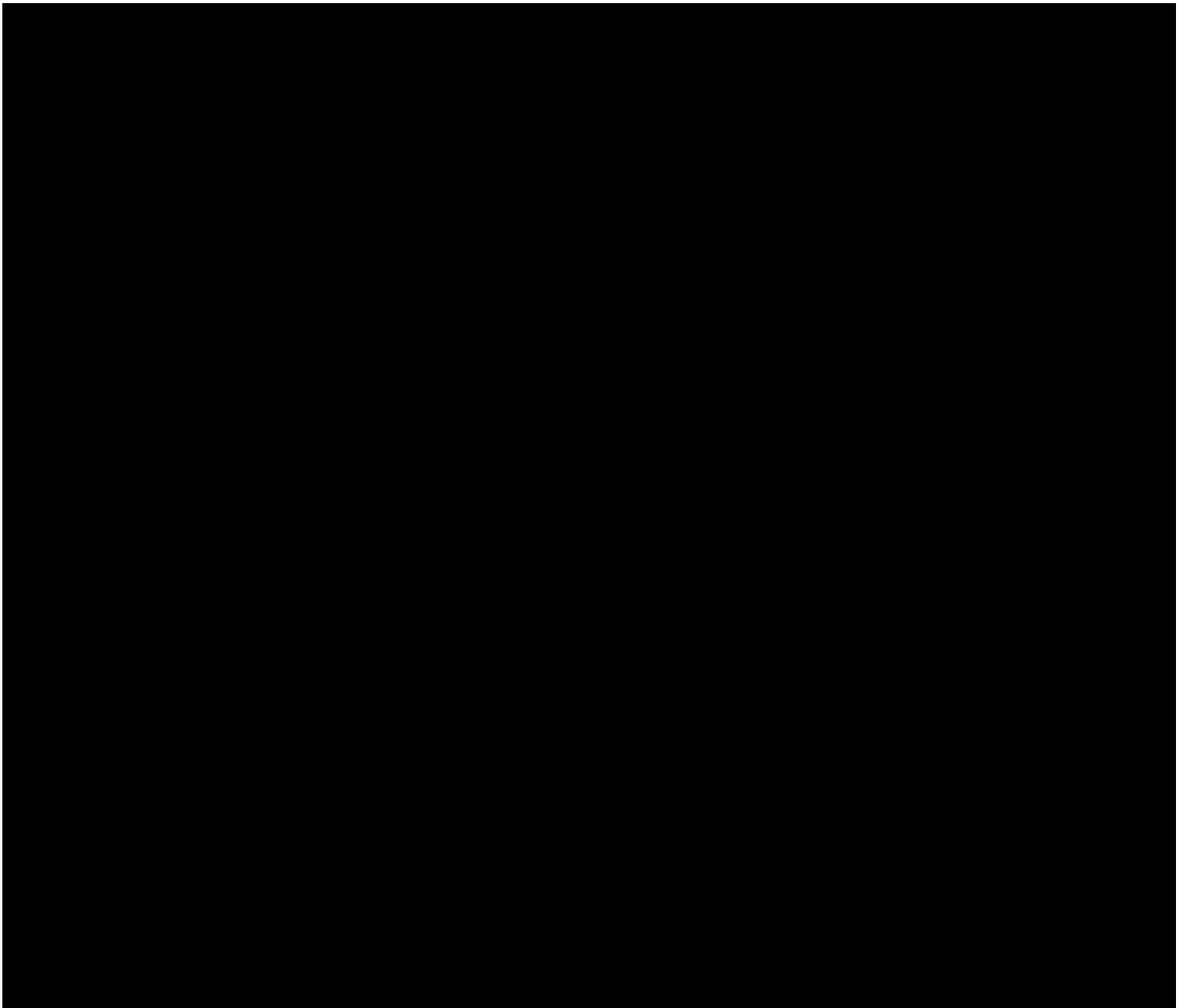
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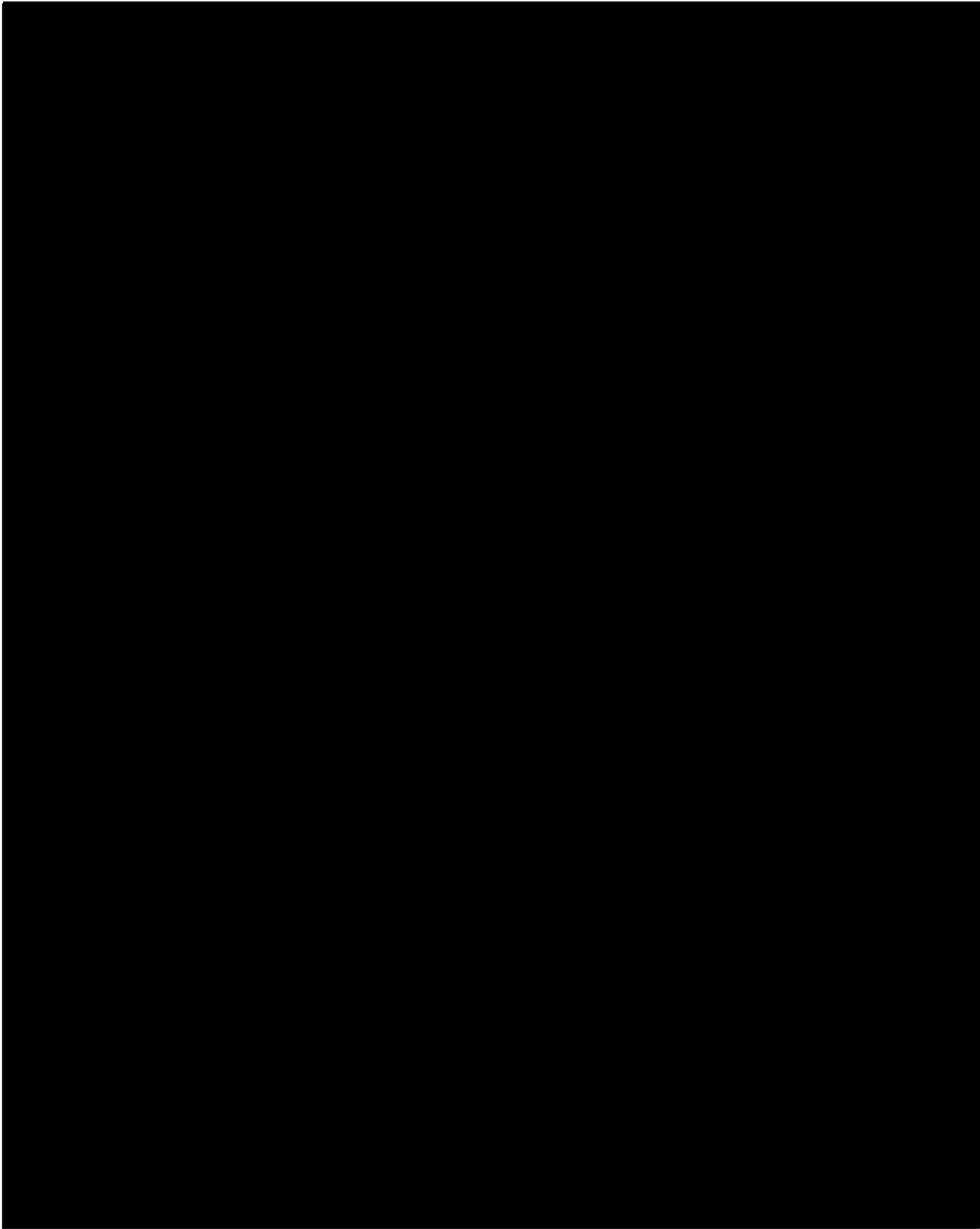
A handwritten signature in black ink, appearing to be "J Wong", written over a horizontal line.

**Johnson Wong**

Project Number: BBLLP\_2311\_P0043

15 W. 37th Street 4th Floor  
New York, NY 10018  
212.581.8870





# Attachment F



November 13, 2023

**Certification**

**Welocalize Translations**

**TRANSLATOR'S DECLARATION:**

I, **Johnson Wong**, hereby declare:

That I possess advanced knowledge of the Chinese and English languages. The attached Chinese into English translation has been translated by me and to the best of my knowledge and belief, it is a true and accurate translation of the document with bates numbers range:- IRI-SU-000402- IRI-SU-000403

*(Digital or printed signature here above the line)*

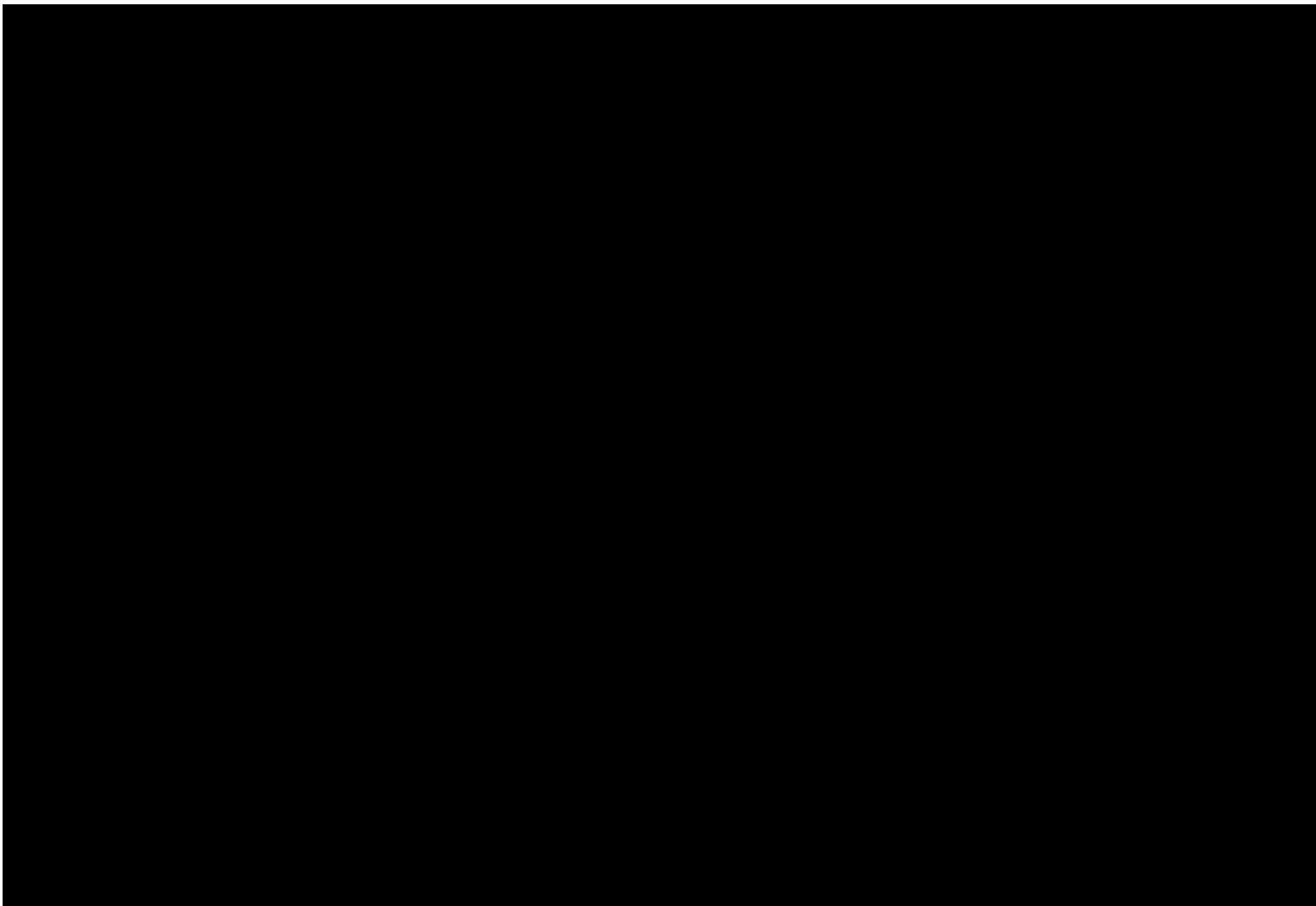
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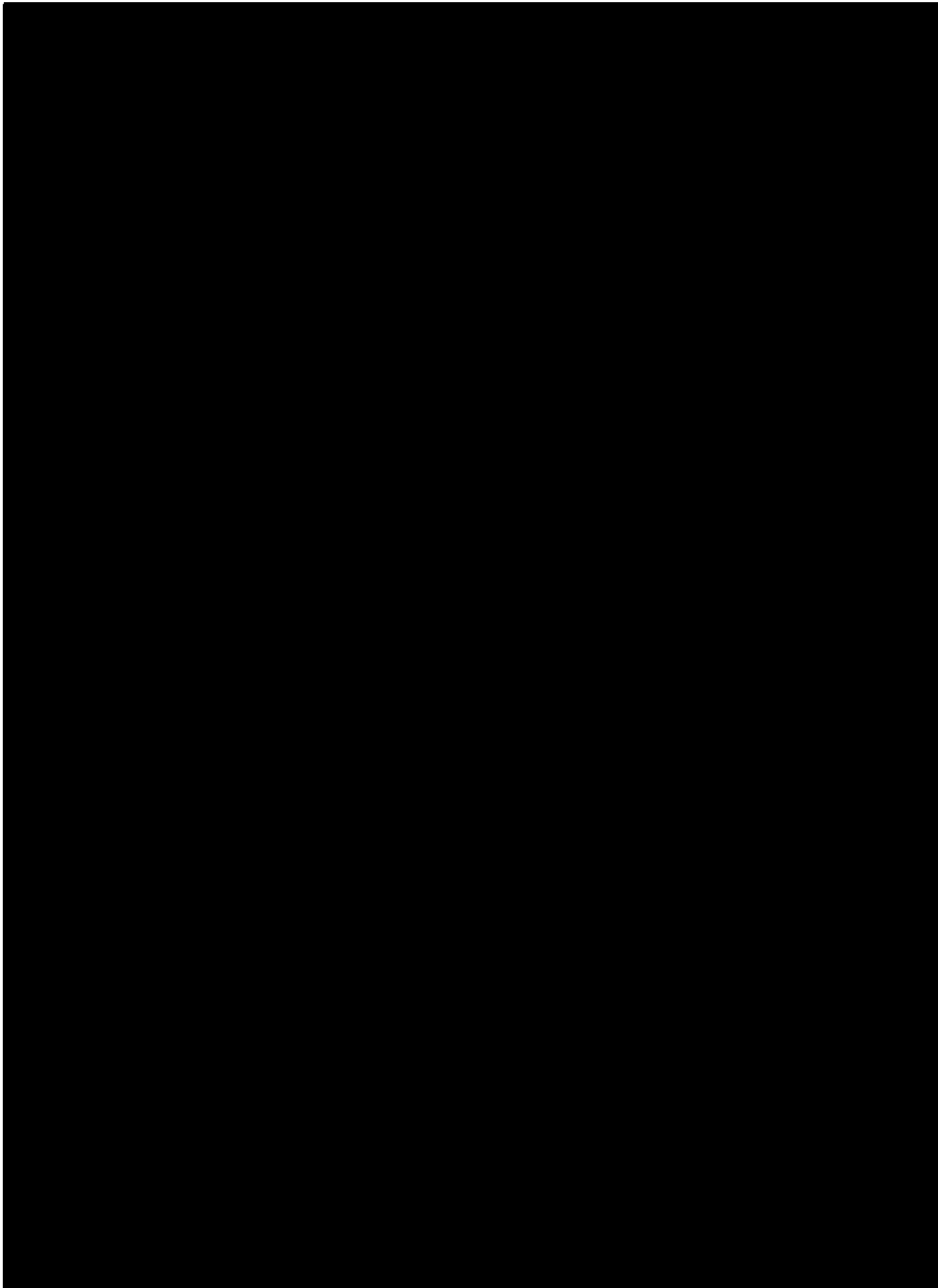
**Johnson Wong**

Project Number: BBLLP\_2311\_P0043

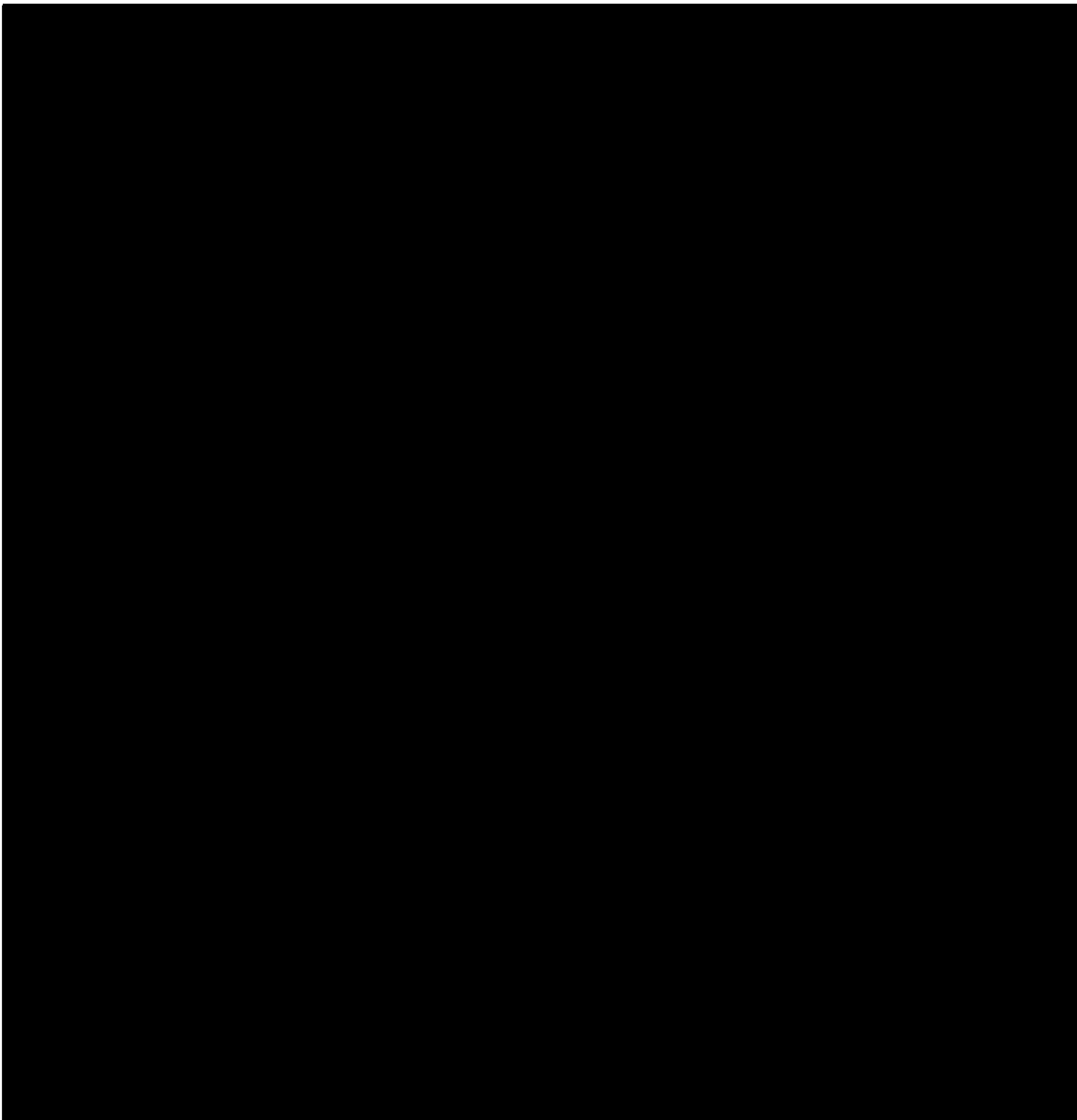
15 W. 37th Street 4th Floor  
New York, NY 10018  
212.581.8870











CONFIDENTIAL

# Attachment G



**certifiedtranslate**  
A LANGUAGE FISH LLC COMPANY

info@certifiedtranslate.com  
www.certifiedtranslate.com

2425 Olympic Blvd., Suite 4000W  
Santa Monica, CA 90404

usa 1-888-856-2228  
int +1-310-684-3153  
fax +1-310-564-1944



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Translators Association  
ATA Member Number: 248719

## CERTIFIED TRANSLATION

### Description of Document(s):

<b>RESIGNATION REPORT</b>
<b>SU XIAOHUA</b>
<b>IRI-SU-000141</b>

Source Language: <b>CHINESE</b>	Target Language: <b>ENGLISH</b>
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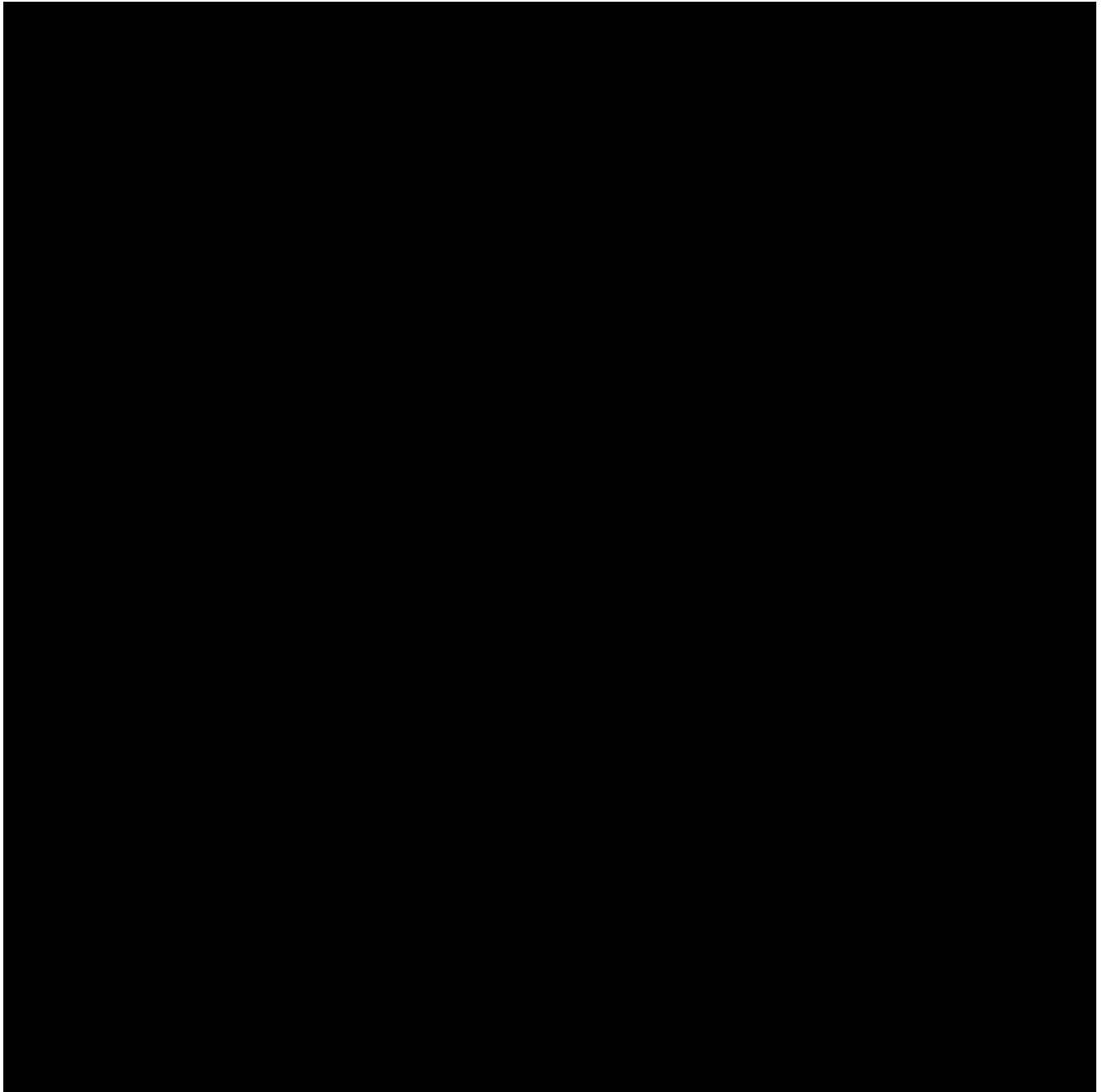
WITH REFERENCE TO THE ABOVE MENTIONED MATERIALS/DOCUMENTS, we at Language Fish LLC (doing business as www.certifiedtranslate.com), a professional document translation company, attest that the language translation completed by Language Fish's certified professional translators, represents, to the best of our judgment, an accurate and correct interpretation of the terminology/content of the source document(s). **This is to certify the correctness of the translation only.** We do not guarantee that the original is a genuine document or that the statements contained in the original document(s) are true.

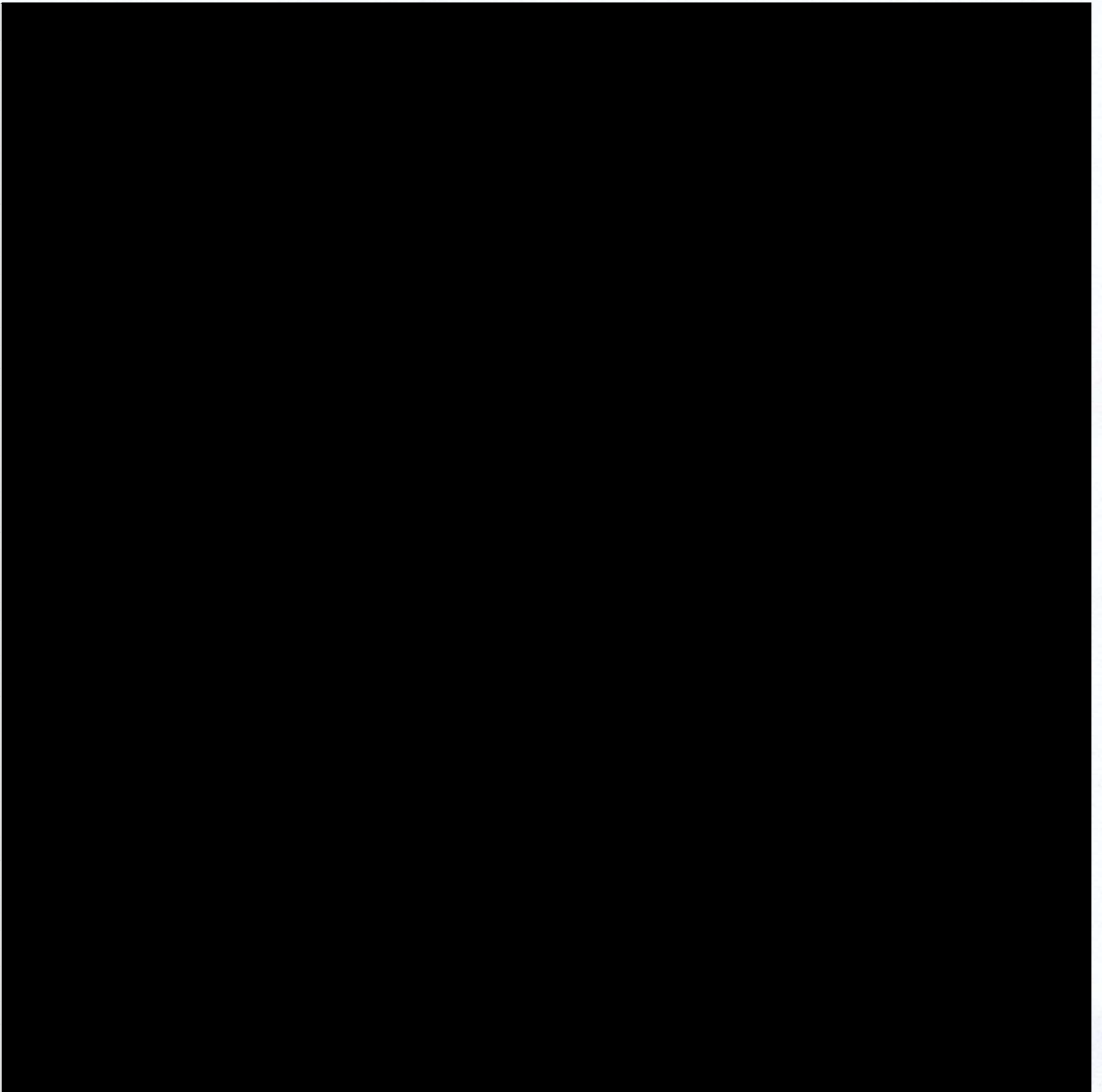
IN WITNESS WHEREOF, Language Fish LLC has caused the Certificate to be signed by its duly authorized officer(s).

**By:** Sean Kirschstein, Director

**Date:** March 3, 2023

A copy of the translated version(s) is attached to this statement of certification.





# Attachment H



November 13, 2023

**Certification**

**Welocalize Translations**

**TRANSLATOR'S DECLARATION:**

I, **Johnson Wong**, hereby declare:

That I possess advanced knowledge of the Chinese and English languages. The attached Chinese into English translation has been translated by me and to the best of my knowledge and belief, it is a true and accurate translation of the document with bates numbers range:- IRI-SU-001006- IRI-SU-001007

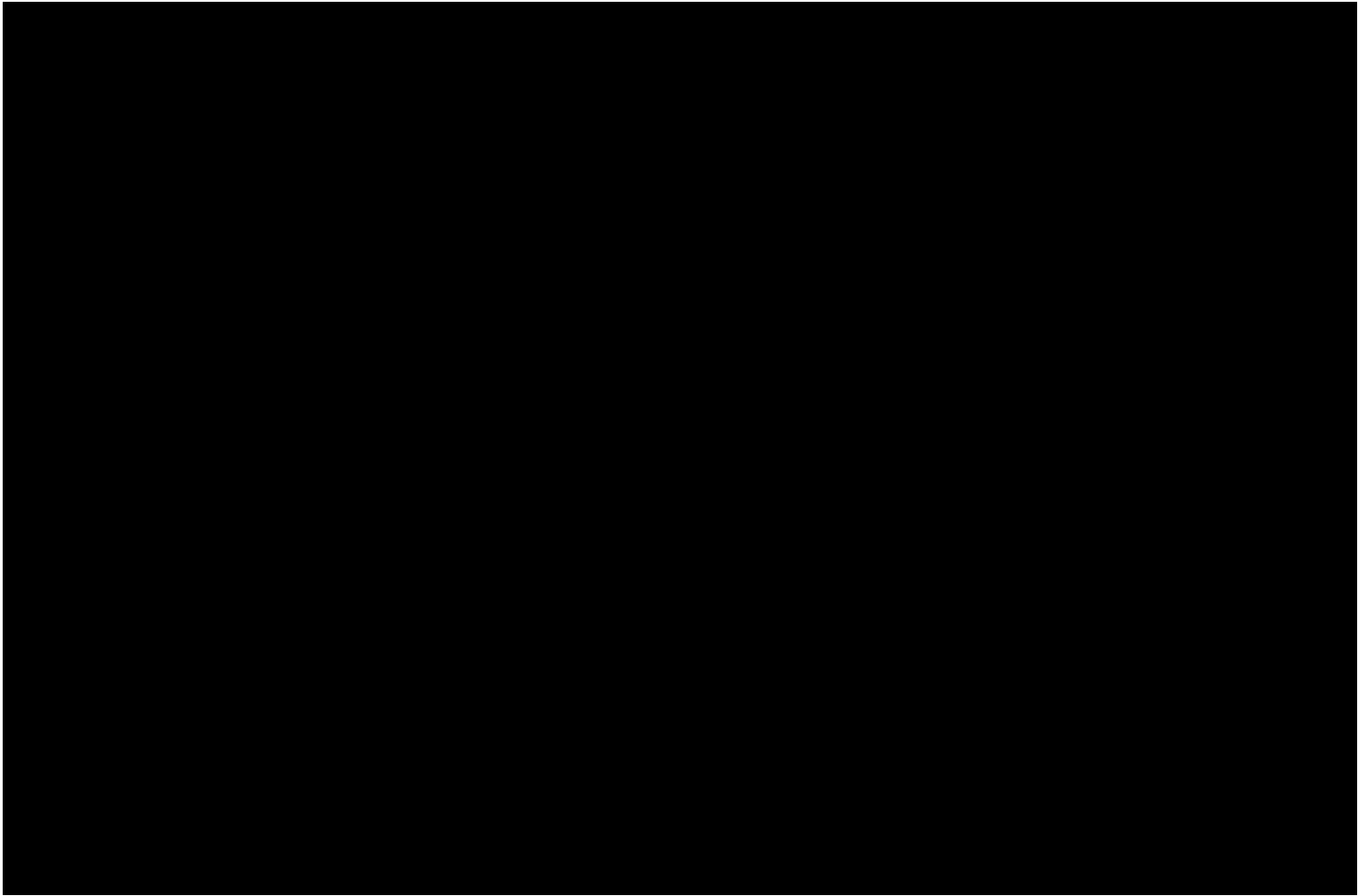
*(Digital or printed signature here above the line)*

A handwritten signature in black ink, appearing to read "Johnson Wong", written over a horizontal line.

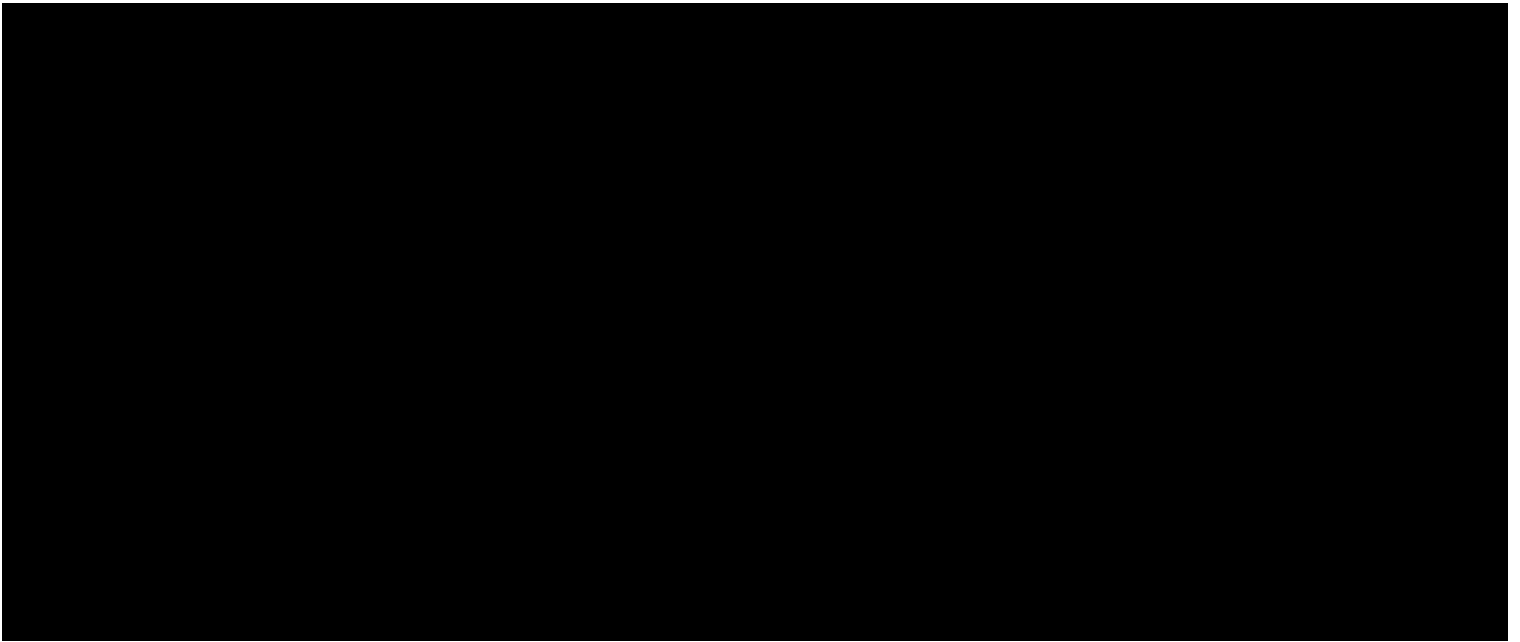
**Johnson Wong**

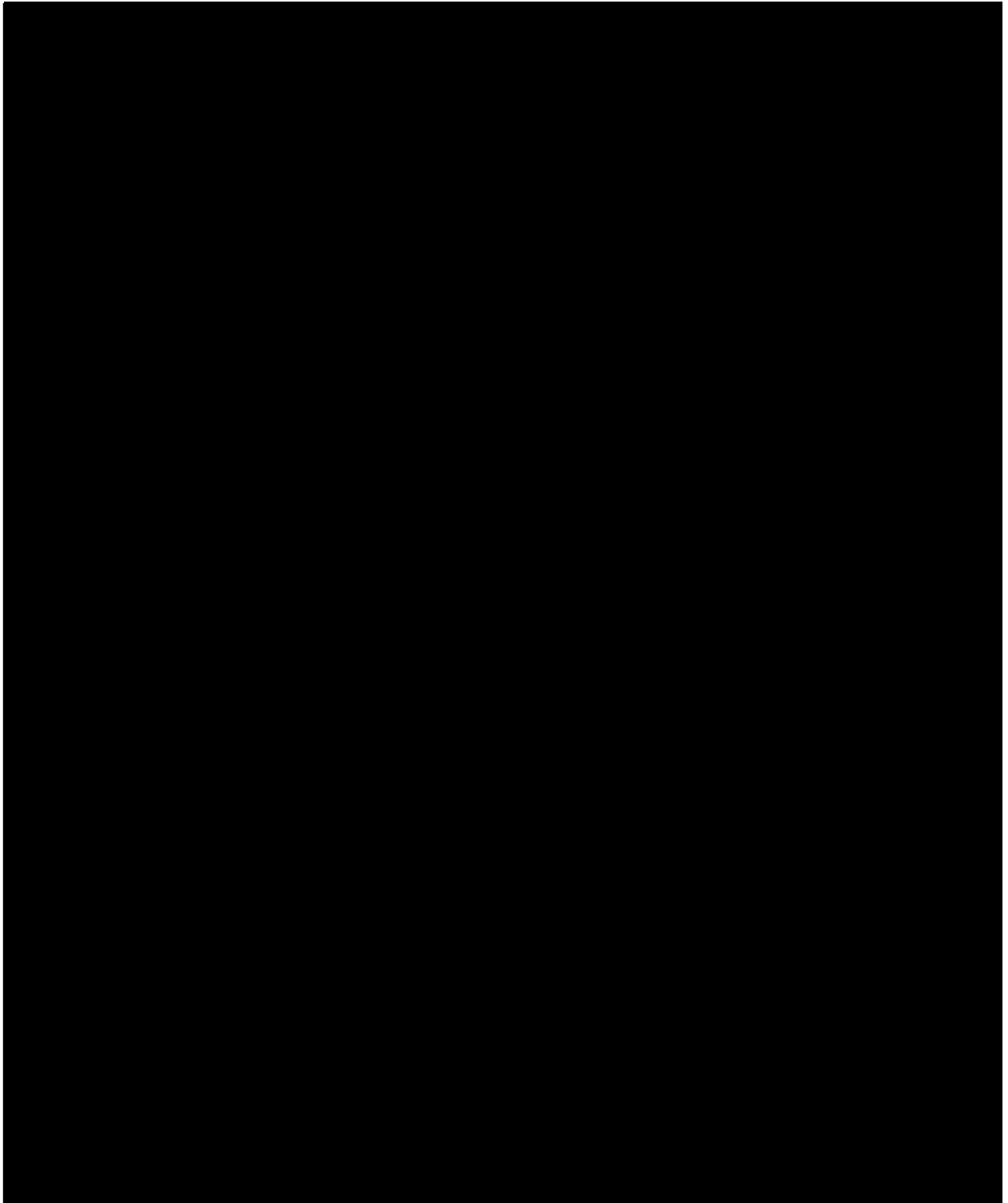
Project Number: BBLLP\_2311\_P0043

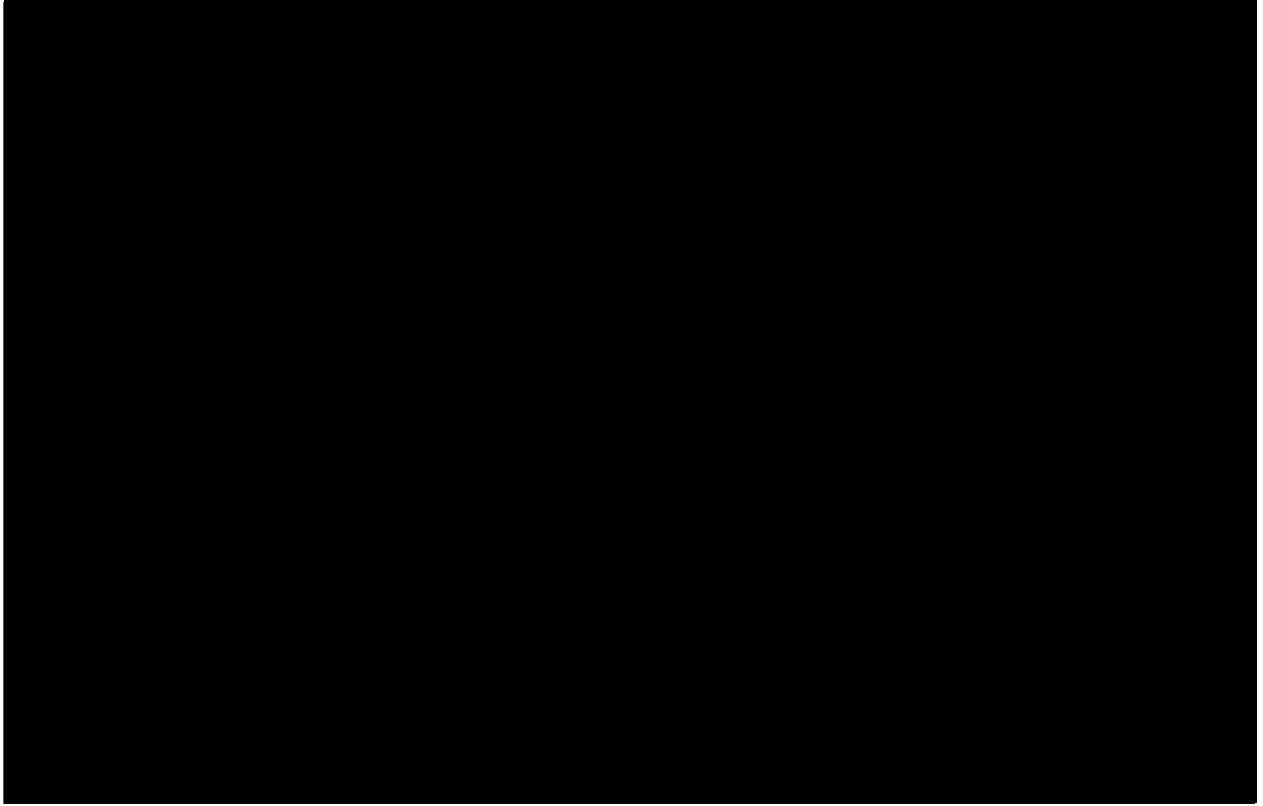
15 W. 37th Street 4th Floor  
New York, NY 10018  
212.581.8870











# Attachment I



November 13, 2023

**Certification**

**Welocalize Translations**

**TRANSLATOR'S DECLARATION:**

I, **Johnson Wong**, hereby declare:

That I possess advanced knowledge of the Chinese and English languages. The attached Chinese into English translation has been translated by me and to the best of my knowledge and belief, it is a true and accurate translation of the document with bates number: IRI-SU-001436

*(Digital or printed signature here above the line)*

A handwritten signature in black ink, appearing to read "Johnson Wong", written over a horizontal line.

**Johnson Wong**

Project Number: BBLLP\_2311\_P0043

15 W. 37th Street 4th Floor  
New York, NY 10018  
212.581.8870









# Attachment J



November 13, 2023

**Certification**

**Welocalize Translations**

**TRANSLATOR'S DECLARATION:**

I, **Johnson Wong**, hereby declare:

That I possess advanced knowledge of the Chinese and English languages. The attached Chinese into English translation has been translated by me and to the best of my knowledge and belief, it is a true and accurate translation of the document with bates numbers range:- IRI-SU-000208 - IRI-SU-000210

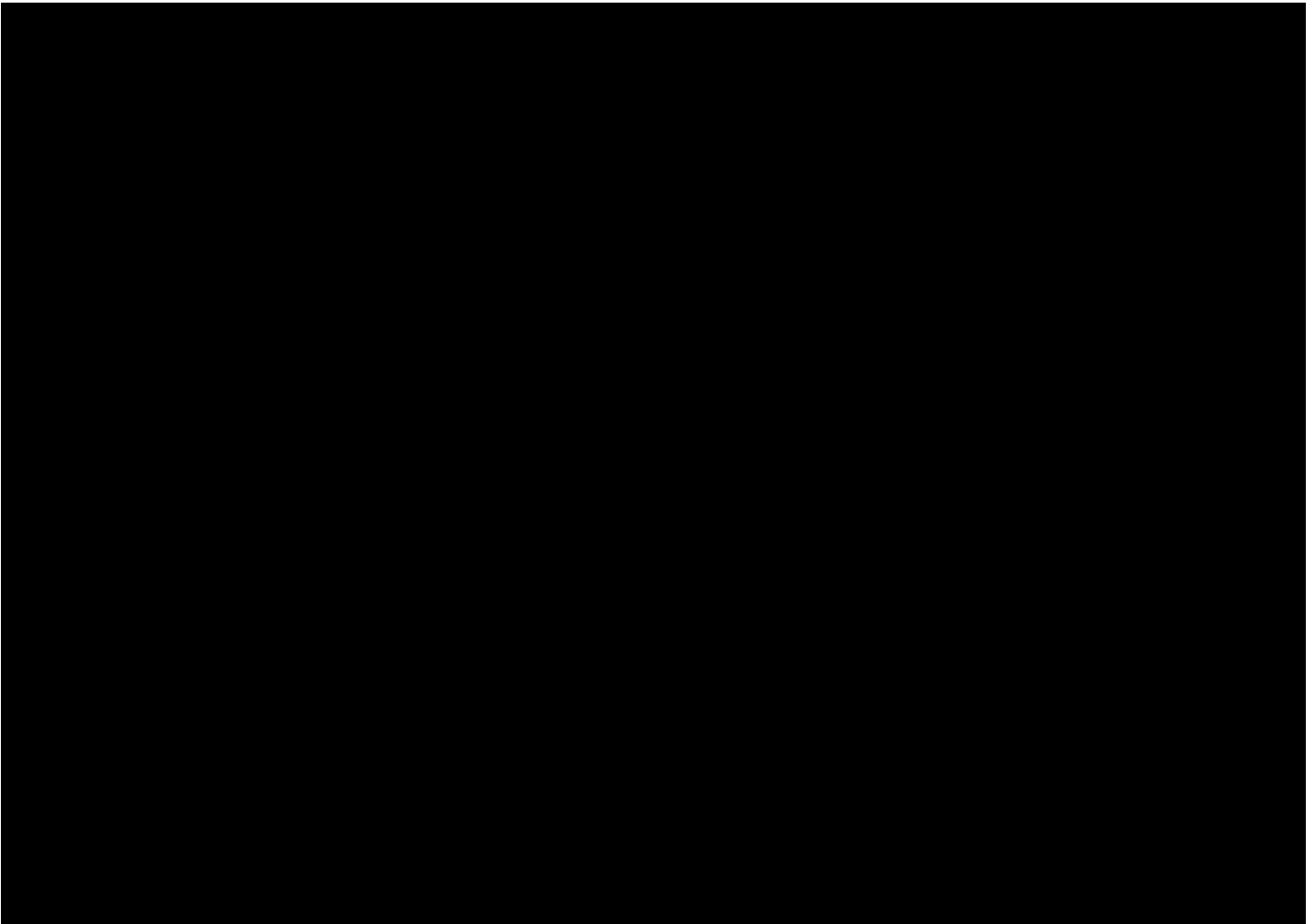
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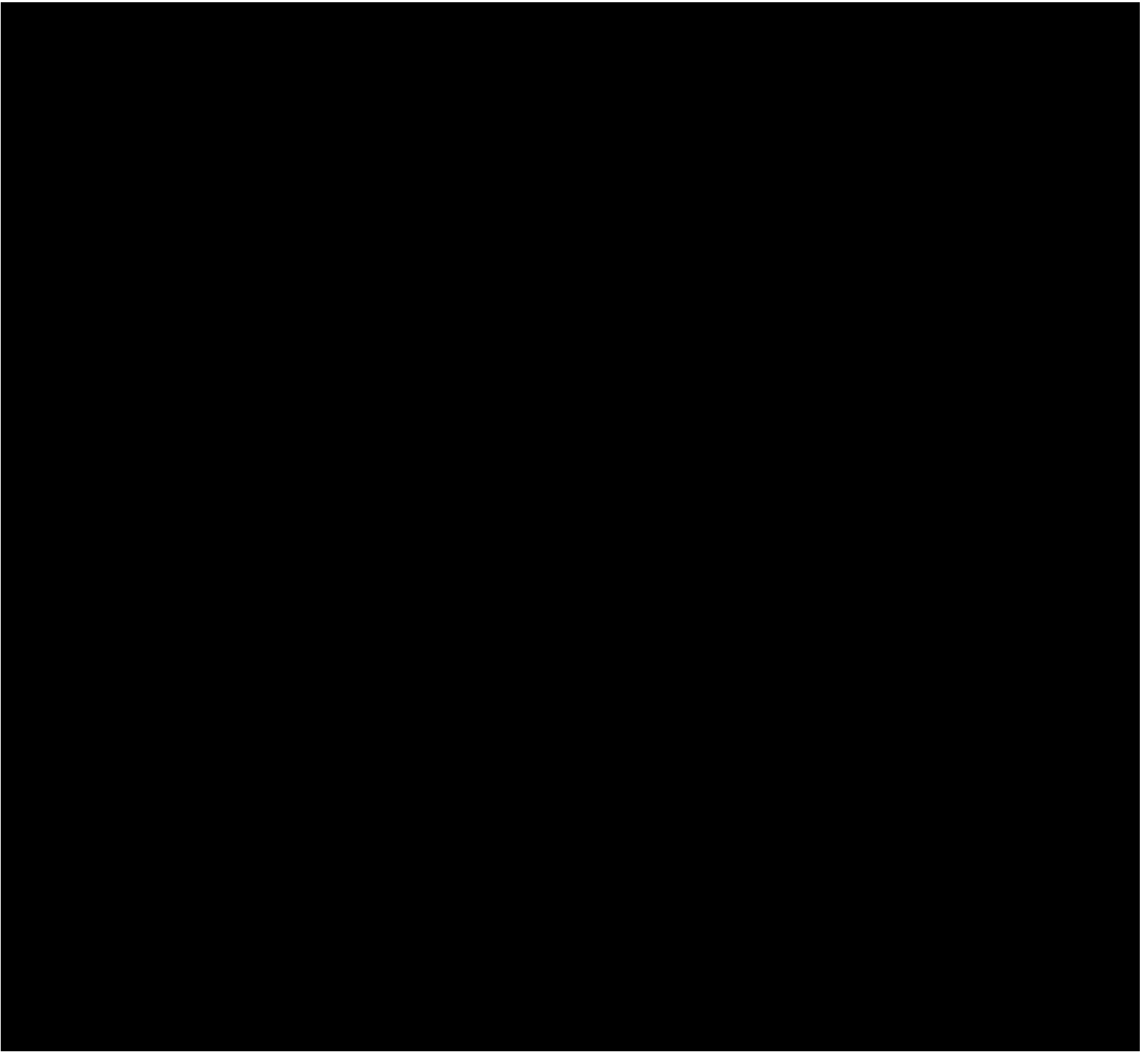
**Johnson Wong**

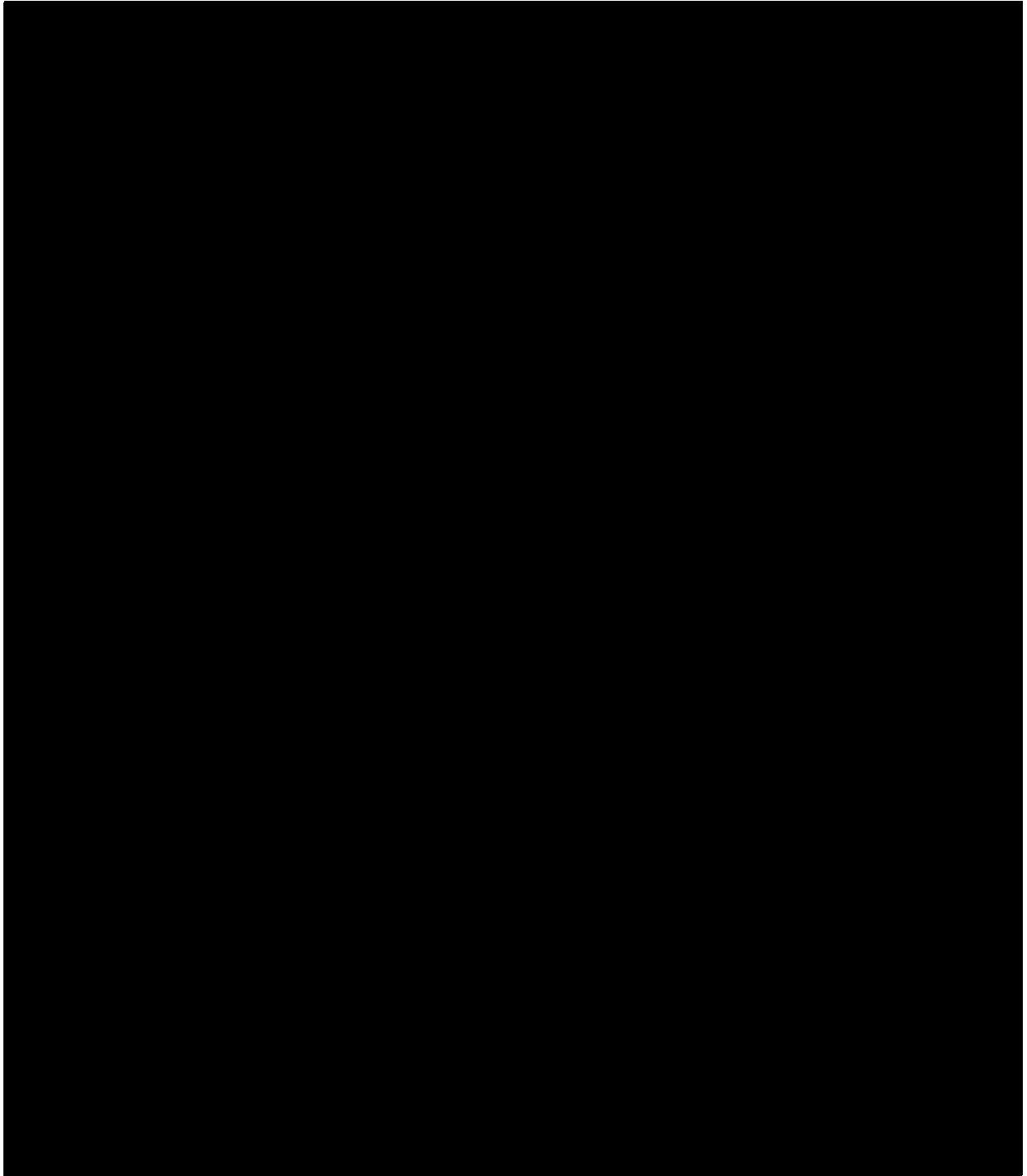
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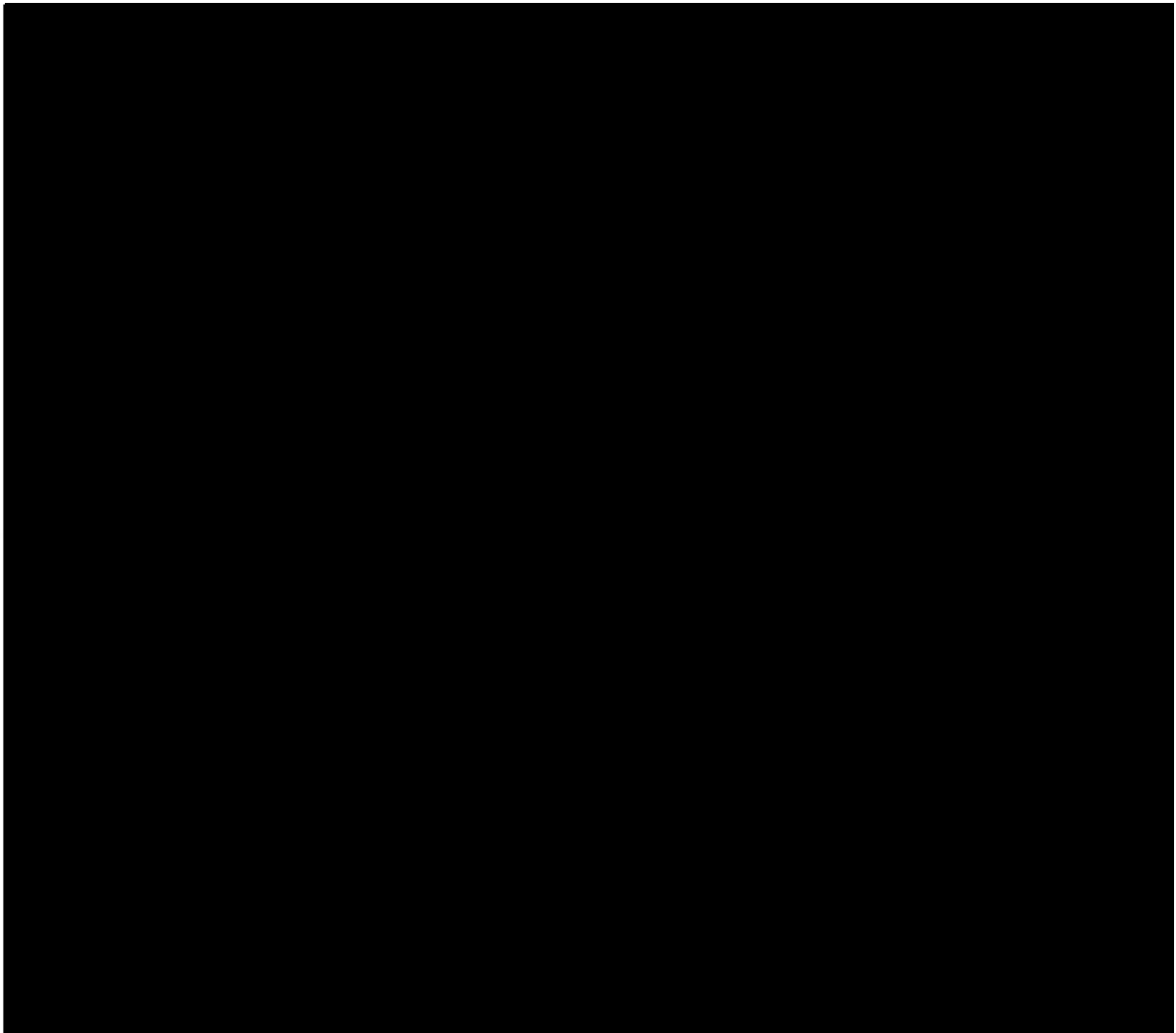
15 W. 37th Street 4th Floor  
New York, NY 10018  
212.581.8870

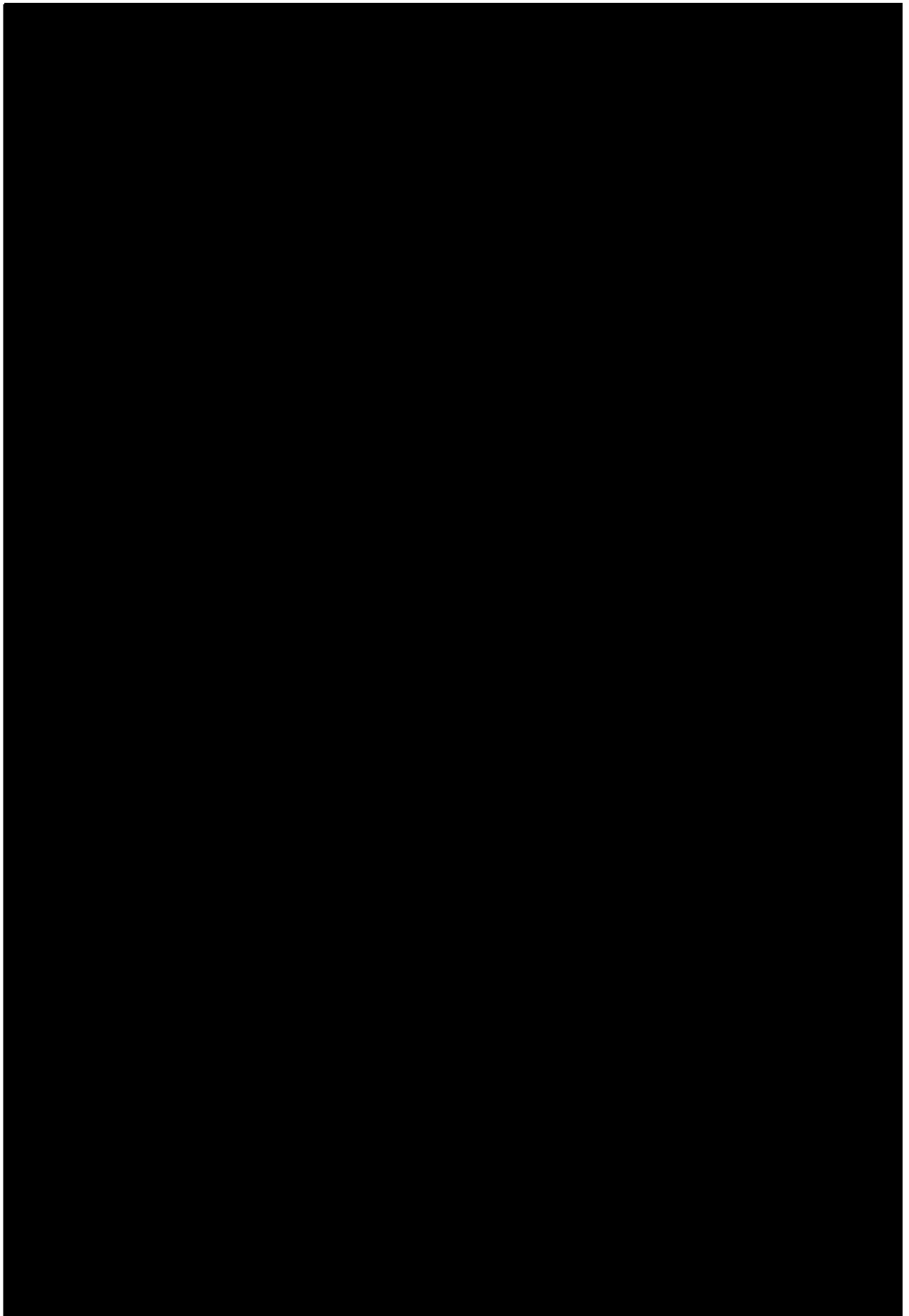














# Attachment K



November 13, 2023

**Certification**

**Welocalize Translations**

**TRANSLATOR'S DECLARATION:**

I, **Johnson Wong**, hereby declare:

That I possess advanced knowledge of the Chinese and English languages. The attached Chinese into English translation has been translated by me and to the best of my knowledge and belief, it is a true and accurate translation of the document with bates numbers range:- IRI-SU-001473 - IRI-SU-001474

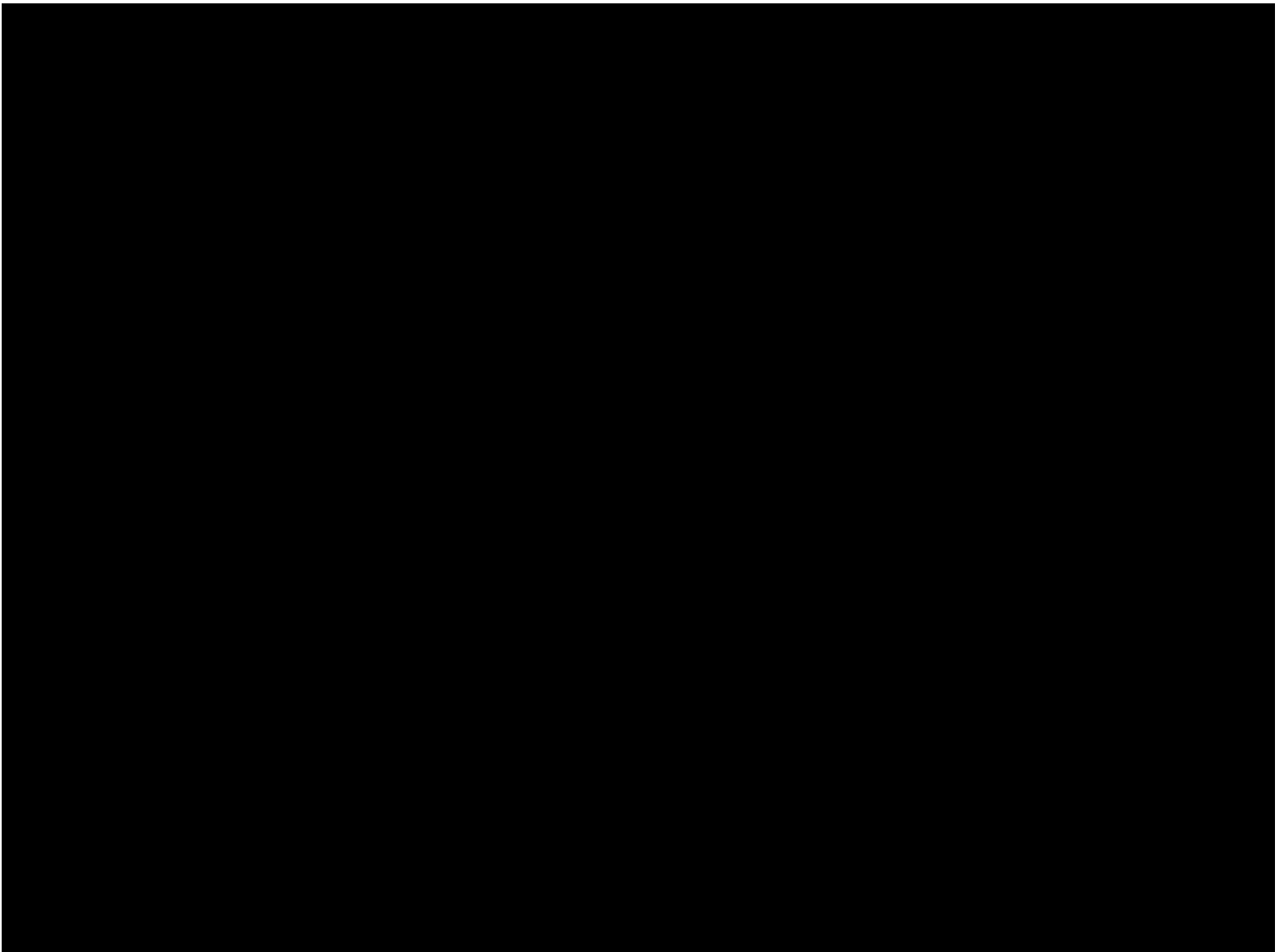
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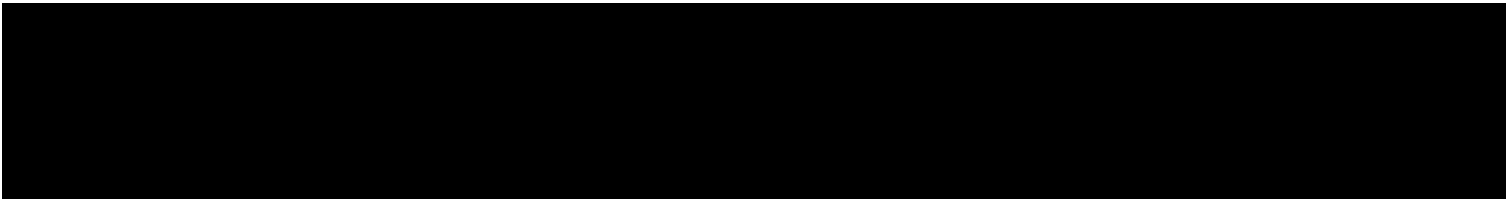
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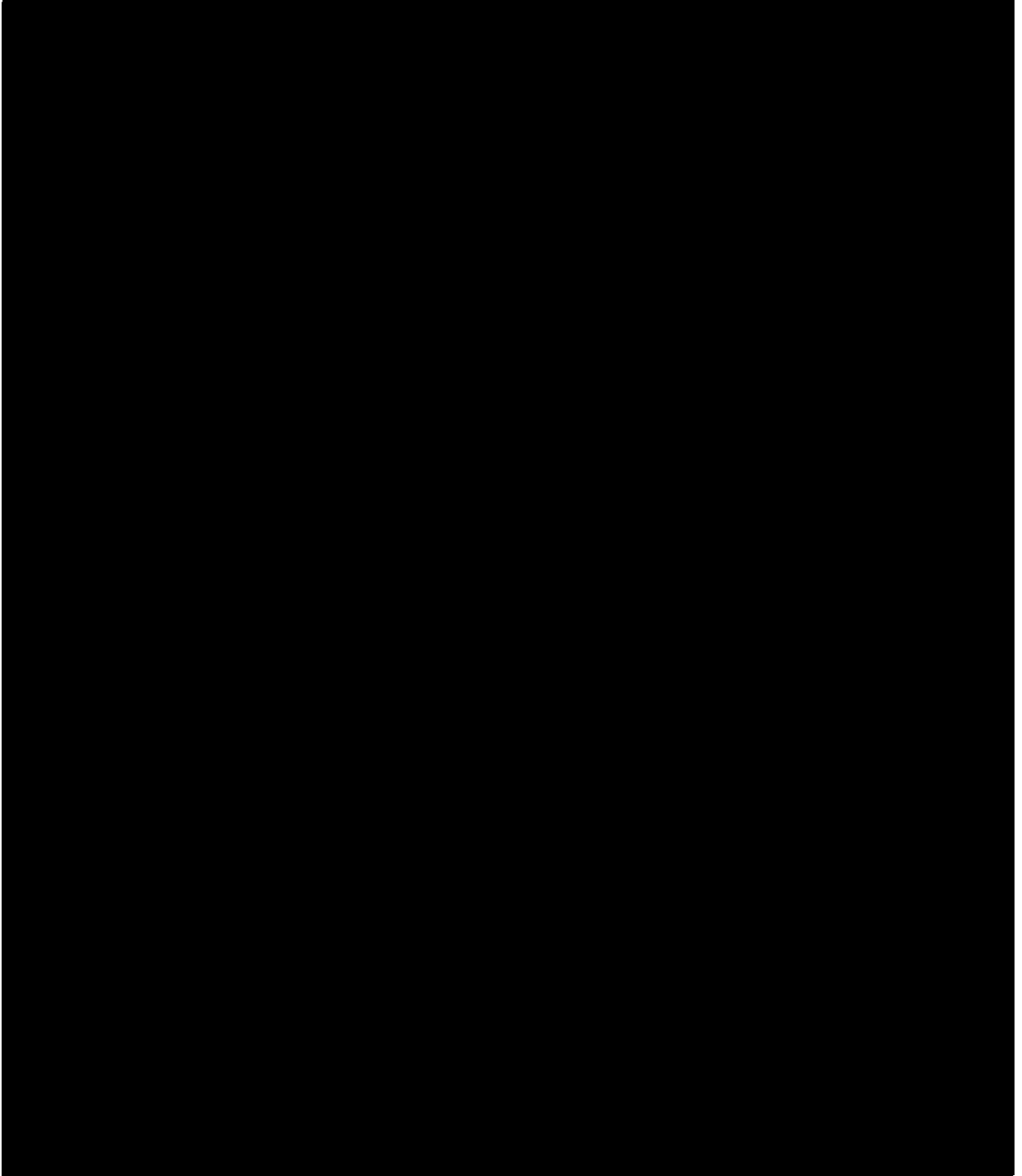
**Johnson Wong**

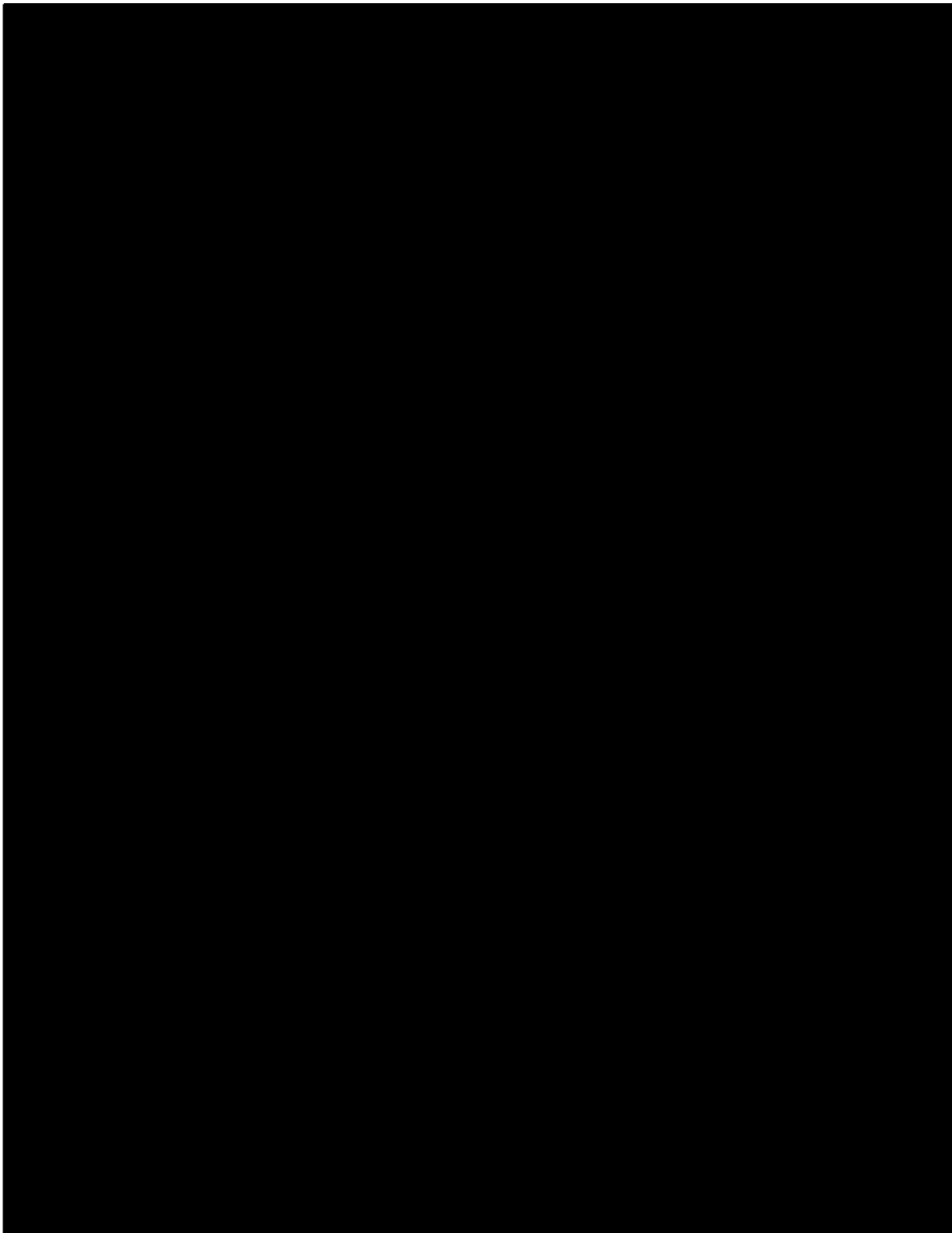
Project Number: BBLLP\_2311\_P0043

15 W. 37th Street 4th Floor  
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212.581.8870









# Attachment L



November 13, 2023

**Certification**

**Welocalize Translations**

**TRANSLATOR'S DECLARATION:**

I, **Johnson Wong**, hereby declare:

That I possess advanced knowledge of the Chinese and English languages. The attached Chinese into English translation has been translated by me and to the best of my knowledge and belief, it is a true and accurate translation of the document with bates number: IRI—SU-001470

*(Digital or printed signature here above the line)*

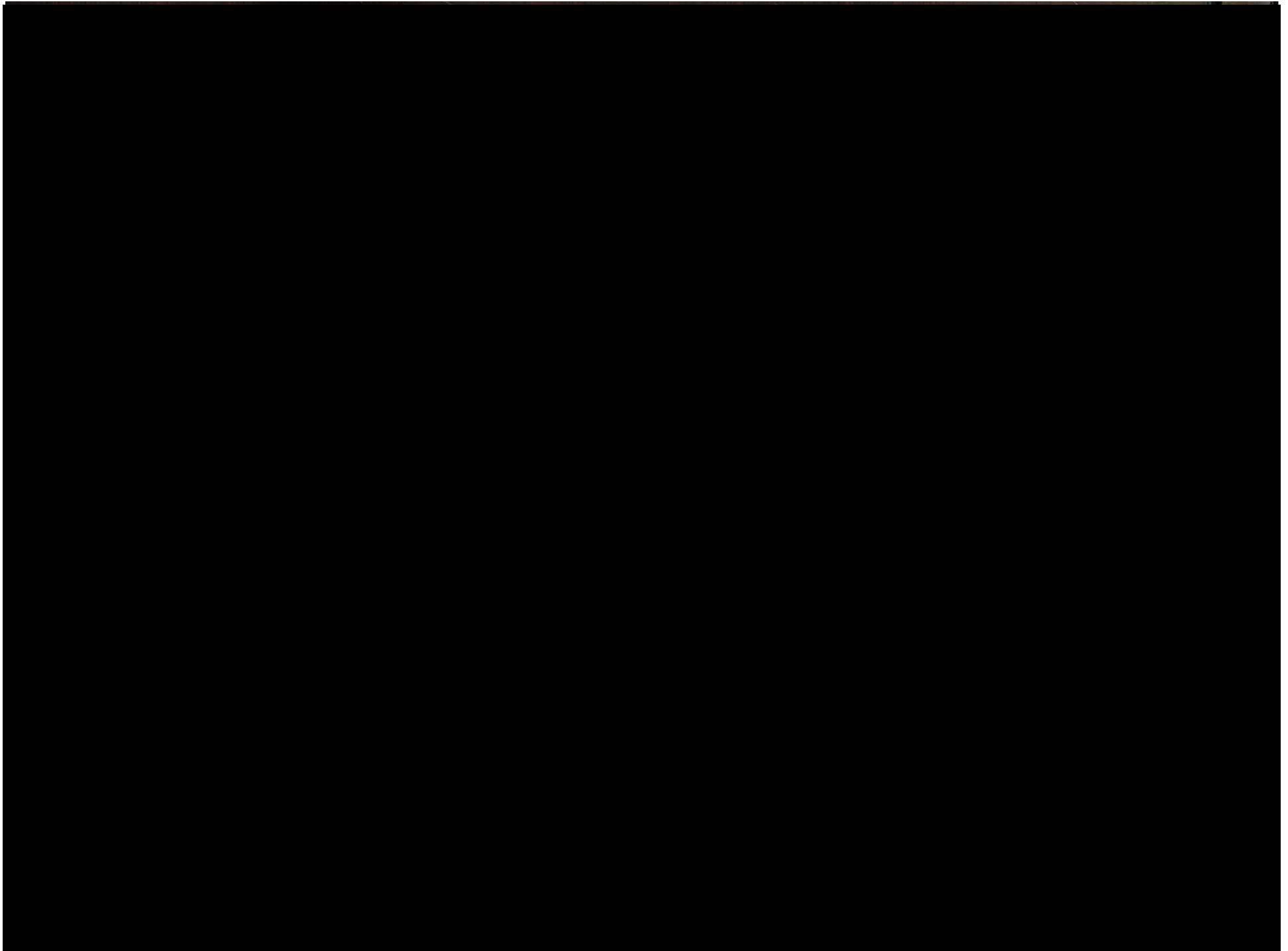
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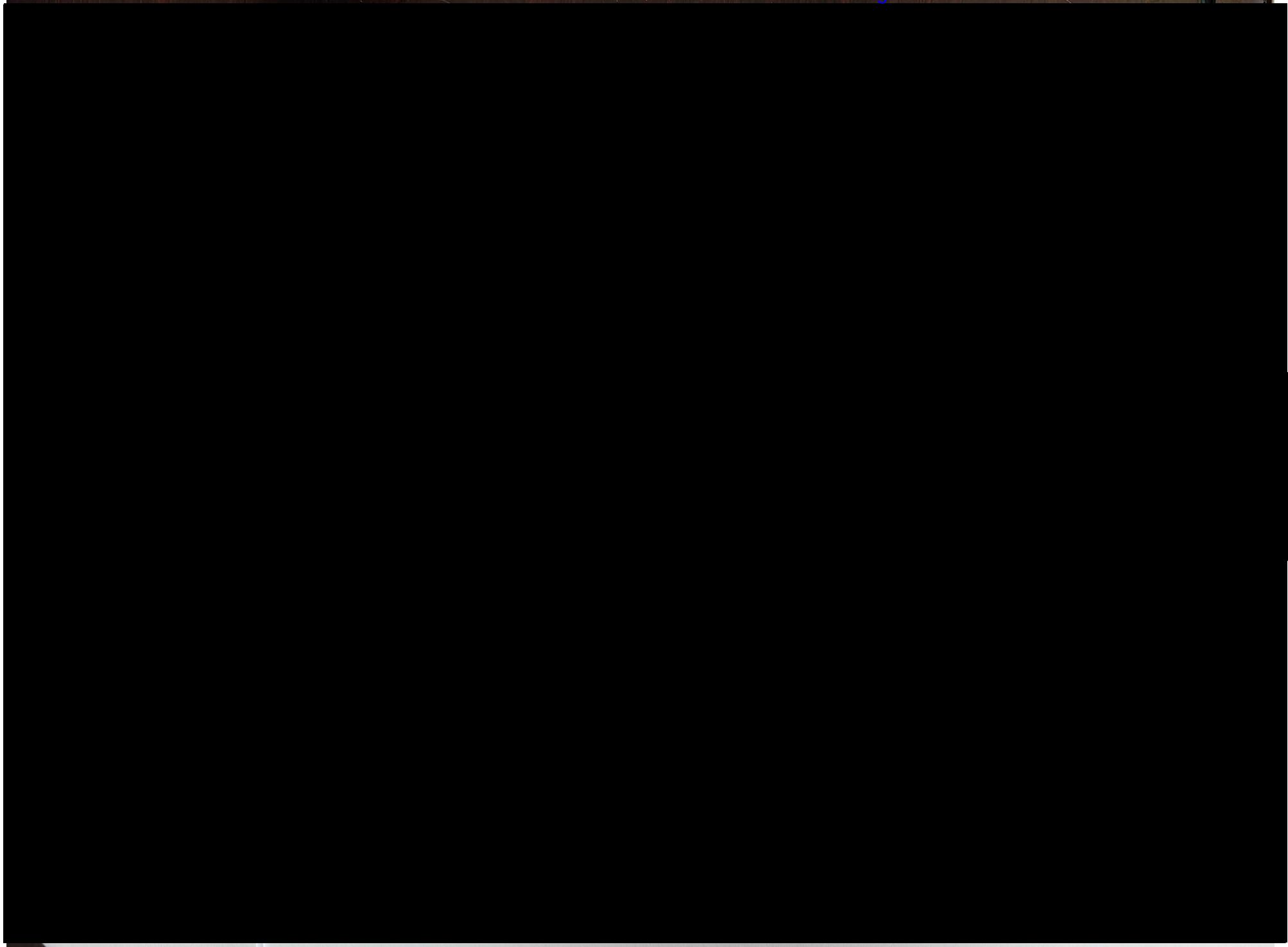
**Johnson Wong**

Project Number: BBLLP\_2311\_P0043

15 W. 37th Street 4th Floor  
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# **DOCUMENT 27**

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SINGAPORE  
**WASHINGTON**

November 28, 2023

**CONFIDENTIAL**

VIA E-MAIL [VRW@JUDGEWALKER.COM]

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The Honorable Vaughn R. Walker  
Law Office of Vaughn R. Walker  
Four Embarcadero Center, Suite 2200  
San Francisco, CA 94111

Re: In re Cathode Ray Tube (CRT) Antitrust Litigation, MDL No. 1917, Master File  
No. 07-CV-944-JST

Dear Judge Walker:

Defendants Irico Group Corp. and Irico Display Devices Co., Ltd. (collectively, “Irico”) respectfully submit this response to Plaintiffs’ Nov. 16, 2023, supplemental letter brief regarding Plaintiffs’ motion for sanctions (“Su Letter Br.”).

Irico’s own Nov. 16, 2023, letter clarifying prior representations regarding Mr. Su (“Su Clarification Letter”) discloses the same underlying facts and documents about Mr. Su Xiaohua’s departure from Irico that Plaintiffs rely on in their submission. Yet Plaintiffs’ supplemental letter brief combines numerous misapprehensions and misstatements about those documents with inflammatory rhetoric in an attempt to paint Mr. Su’s departure as some grand, nefarious scheme reflecting “deception” or “continuing misrepresentations” by Irico. These allegations are misplaced.

At bottom, despite Plaintiffs’ overblown claims to the contrary, the key facts regarding Mr. Su’s departure remain the same: Mr. Su, notwithstanding his concerns about Covid-19 restrictions in place at the time, gave all appearances of cooperating with efforts to plan his deposition until late May of 2022 – before his travel visa could be obtained – at which time he informed the Irico Group legal department that he was leaving Irico and would not travel to complete his deposition. Thus, there was no moment in time at which Mr. Su was both willing and legally able to travel for his deposition such that Irico refused to produce him for deposition.

Finally, the circumstances regarding Mr. Su’s departure still cannot justify the terminating or other severe sanctions that Plaintiffs request. Mr. Su was in no way a key witness to the relevant facts of the case such that a determination on the merits is made impossible by his absence. Nor is there evidence of an intentional effort by Irico to deprive Plaintiffs or the court of the benefit of Mr. Su’s deposition testimony.

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**I. Responses to Plaintiffs' Recitation of Claims about the Recent Su Productions**

Plaintiffs begin their supplemental letter brief with a recitation of misleading claims about Mr. Su's departure and Irico's intentions. Irico addresses each in turn below. Plaintiffs' claims (in *italics* below), and appropriate clarifications to address these misstatements, are:

- *"Mr. Su did not 'retire' on May 25, 2022. Rather, he was granted early participation in an Irico program whereby senior executives who have reached the age of 58 are allowed to take 'off-duty and rest' status from their positions at the end of the year, but continue to be paid and employed by Irico."* Su Letter Br. at 1-2.
  - Plaintiffs misapprehend the situation and appear to be engaging in translation gamesmanship. The "Irico program" Plaintiffs refer to is not (as Plaintiffs imply) a special reward granted for Mr. Su, but rather a mandatory program of the Chinese government for state-owned enterprises like Irico to move younger managers into leadership positions earlier. *See* Attachment 1 (China Regulations on Surplus Staff in State-Owned Enterprises), Art. 9 ("Employees who are less than five years from the retirement age can, upon their application and with the approval of the [state-owned] enterprise leadership, leave their job positions for rest.") Moreover, Plaintiffs' own prior translations of Irico's documents produced in December 2022 rendered the *same phrase* (离岗休息, *lí gǎng xiūxi*) as "retire and rest." *Compare* Hwu Decl. Ex. E at IRI-SU-000139E (Jan. 2023 translation rendering phrase as "retire and rest") *with id.*, Ex. B (Nov. 2023 translation rendering same phrase as "off-duty and rest"). In order to take advantage of this policy, Mr. Su was required to "resign from [his] positions as [a] manager[]," *see* Su Clarification Letter, Attachment B (IRI-SU-001254E) at -278E. This was a permanent change in Mr. Su's status that relieved him of any job duties and authority.
- *"Mr. Su did not go on 'off-duty and rest' status until at least June 17, 2022—after Irico told Plaintiffs it could not produce him, after his Macau visa was granted, and after the time his deposition was to occur."* Su Letter Br. at 2.
  - As disclosed in Irico's Nov. 16, 2023 letter, June 17, 2022 was the official handover date to Mr. Su's replacement, Zhang Jiming. When Mr. Su submitted formal requests to resign from his management positions in May 2022, his replacement had to be identified. Mr. Zhang's name first appears in responsive documents beginning on June 6, 2022, *see* Su Clarification Letter, Attachment H, indicating that he likely was not identified as Mr. Su's replacement until that time. According to other employees at Irico Foshan, Mr. Su stepped back from his duties at Irico and stopped reporting

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to his office for work well before this date, except for executing a few ministerial approvals required of the position. *See, e.g.*, Hwu Decl., Ex. R (IRI-SU-001454E). And regardless of the official date of Mr. Su's dismissal, he had unequivocally refused to travel for deposition as of May 31, 2022, given his departure and his grave concern over the stringent Covid-19 quarantines in effect at that time. *See* ECF Nos. 6027-3 at ¶ 6; 6036-1 at ¶ 4.

- *“Irico’s claims of ‘surprise’ are false. Mr. Su’s change to ‘off-duty and rest’ status was a months-long process that was well known within Irico before it negotiated an extension of the Court-ordered deadline for his deposition; the withheld evidence includes another application by Mr. Su for a change in status dated May 5, 2022 that is virtually identical to his purported May 25, 2022 ‘resignation.’”* Su Letter Br. at 2.
  - As it relates to planning for his deposition, Mr. Su’s departure was indeed a complete surprise. Irico Group’s legal department, which was coordinating Mr. Su’s planned deposition travel, was not informed of Mr. Su’s intent to leave and refusal to cooperate further until May 31, 2022. *See* ECF No. 6036-1 at ¶ 4. In contrast, the employees involved in coordinating the “months-long process” cited by Plaintiffs were primarily Human Resources staff at Irico Group and Xianyang Irico Industrial Co., Ltd. They had no reason to know of Mr. Su’s planned deposition. *See* Su Clarification Letter at 1-2. Furthermore, the April 7 meeting minutes that initiated the process did not specify a date (other than before December 2022) for Mr. Su’s departure, and Mr. Su made no formal request in writing to leave his management positions until his letter of May 5, 2022. Irico explained in its Nov. 16, 2023, letter how both the May 5 and May 25 letters were specifically requested by Irico Industrial’s HR head to process Mr. Su’s request to resign from his management positions. *Id.* at 2. These facts do not support any inference that Mr. Su’s departure was an intentional effort by Irico to prevent Mr. Su from giving a deposition.
- *“Irico’s claims that it did everything in its power to convince Mr. Su to testify are false; the record remains devoid of evidence of any attempt by Irico to persuade Mr. Su to appear for deposition. To the contrary, Irico rewarded Mr. Su by, inter alia, granting him “off-duty and rest” status ahead of schedule, allowing him to receive a substantial deferred compensation payment in July 2022, a bonus in January 2023, and a positive employment review in May 2023.”* Su Letter Br. at 2.
  - Plaintiffs distort the facts mightily here, by re-branding required payments to Mr. Su as “rewards” and inventively describing his required (and

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somewhat unflattering) audit report as a “positive employment review.” First, Plaintiffs conveniently fail to mention that the July 2022 payment was owed to him “for the year **2021**.” *See* Hwu Decl., Ex. L at IRI-SU-000845E (emphasis added). Second, the “bonus” from January 2023 – totaling approximately \$350 with current exchange rates – was based on objective criteria applicable to **all** employees who worked at Irigo Foshan during the year 2022 and was **reduced** by 50% given Mr. Su’s early departure. *See* Hwu Decl., Ex. J at IRI-SU-000422-423E. Third, the “employment review” Plaintiffs mention was in fact an “Economic Responsibility Audit Report” conducted of all former managers, which (as the name implies) focused on financial matters, finding significant deficiencies during Mr. Su’s tenure. *See* Hwu Decl., Ex. N at IRI-SU-000198E (“The audit revealed that during the tenure of Su Xiaohua, IRICO Industrial (South China) Co., Ltd. had issues such as inadequate operational control, noncompliant financial management, and weak internal control. As the general manager of the company, Comrade Su Xiaohua bears leadership responsibility for these identified issues.”). Finally, Plaintiffs simply ignore the revealing and ongoing communications between Zhang Wenkai and Mr. Su exhorting Mr. Su to gather required documentation for visa approvals in late May of 2022. *See* Carter Decl. in Support of Irigo Opposition to Plaintiffs’ Mot. for Discovery Sanctions (Apr. 21, 2023), Ex. K (IRI-SU-000103E). As Irigo has noted, these communications verify that Mr. Su gave every impression that he intended to appear for his deposition until his ultimate refusal on May 31, 2022.

- *“Irigo’s production confirms the Court’s finding that Irigo intentionally withheld documents in violation of the Su Order—at least the sixth Court order it has defied—and did so to facilitate its false narrative.”* Su Letter Br. at 2.
  - Plaintiffs’ allegation of “intentionally withheld documents” is baseless and inflammatory. Plaintiffs ignore that the scope of the Special Master’s orders differed substantially between the initial Su Order in December 2022 and the more recent Interim Orders in August and September of 2023. The initial Su Order required a “targeted collection” on seven discrete issues with a two-week timeframe. *See* ECF No. 6115 at 12-13. The Interim Orders of August and September 2023, by contrast, demanded a much broader forensic collection from various electronic systems using search terms that required two months of intensive work to complete, *see* ECF No. 6264 at 7-9; 6275 at 5-6. It was therefore completely expected that more documents would be produced given the expanded scope of the Interim Orders. Plaintiffs’ claim that any such gaps were “intentional” makes no sense given that the additional documents were produced after a broader forensic search was ordered.

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- *“Irico continues to destroy and withhold evidence. The Declaration of John M. Taladay Regarding Compliance with Interim Orders on Plaintiffs’ Motion for Discovery Sanctions (Oct. 23, 2023) admits that Irico wiped Mr. Su’s laptop in June 2022, that Mr. Su cleared out all documents from his office, and that Mr. Su’s cell phone has not been searched.”* Su Letter Br. at 2.
  - In this assertion, Plaintiffs invent discovery obligations that did not exist and then imagine they were violated. At the time Mr. Su departed his position and at the time his laptop was reformatted in June 2022, there was no discovery request or order relating to his laptop. There also was no basis to believe that Mr. Su’s laptop held any information relevant to the substance of this litigation, given that it was issued by a company that had nothing to do with the CRT industry that Mr. Su first began working for in December of 2019, more than 12 years after the end of the alleged conspiracy in this case. Taladay Decl. (Oct. 23, 2023) at ¶ 6. The same logic applies to any hard copy files kept in Mr. Su’s office in Foshan, an office that he did not occupy before December of 2019. And there was no discovery request or court order that would implicate Mr. Su’s laptop or any other files from his work at Irico Foshan until the Special Master’s first Su order in November 2022.<sup>1</sup> Thus, Plaintiffs’ reckless assertion that Irico “destroyed or with[held] evidence” by the routine re-purposing of Mr. Su’s laptop is meritless. Finally, Mr. Su’s cell phone is a personal device, not issued by Irico, and could not be collected without Mr. Su’s permission, which he did not provide. See Taladay Decl. ¶ 9.
- *“Despite the dispute over the date of Mr. Su’s ‘resignation letter’—3/25/22 or 5/25/22—Irico has failed to provide an electronic version of the letter with metadata, or any other evidence showing when Mr. Su first applied to leave his position ahead of schedule, e.g., the communications leading to the April 7, 2022 meeting at which Group approved Su’s request to go ‘off-duty.’”* Su Letter Br. at 2.
  - Irico informed Plaintiffs over six months ago that the May 25, 2022, letter was hand-delivered by Mr. Su and therefore there was no metadata, and Plaintiffs acknowledged as much in their reply brief. See Plaintiffs’ Reply in Support of Motion for Sanctions (May 26, 2023) at 14 n.25. Yet now, Plaintiffs attempt to present this undisputed fact as if it were some new revelation to improperly suggest wrongdoing on the part of Irico. The circumstances of Ms. Hao’s request for the revised letter in May 2023 make it impossible that it could be dated on March 25, 2022, as Plaintiffs still

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<sup>1</sup> Irico confirmed previously that Mr. Su had no remaining hard copy or electronic files related to Irico’s CRT business that might have been responsive to Plaintiffs’ various discovery requests.



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claim. *See* Su Clarification Letter at 2. Finally, as described in Irico’s Nov. 16 letter, Mr. Su made an oral request to resign early from his management roles at some point shortly before the April 7, 2022, meeting, which led to its discussion at that meeting. These facts, unlike the fiction of a March 25 letter that Plaintiffs continue to push, are fully consistent with the discovery record.

## **II. Responses to Additional Inaccuracies Asserted by Plaintiffs**

Plaintiffs make several additional claims in the body of their supplemental letter brief that do not square with the facts here.

***Disputed search terms.*** First, Plaintiffs imply that it was improper that Irico “did not review over 30,000 documents identified by Plaintiffs’ search terms,” Su Letter Br. at 5, 10. To the contrary, Irico followed the requirements of the Special Master’s Second Interim Order to the letter, collecting full sets of documents from numerous custodians’ email and internal text message files (including all those hitting on Plaintiffs’ overbroad search terms), preserving those documents pending resolution of the disputed search terms, and presenting the dispute to the Special Master in a timely manner. *See* Taladay Decl. ¶¶ 23-25; Irico Status Update and Request for Extension (Oct. 9, 2023) at 4-6.

***Mr. Su was not issued another computer by Irico.*** Second, Plaintiffs appear to misunderstand comments made by Mr. Su to Mr. Zhang in their last phone conversation on August 23, 2023, regarding the computer used by Mr. Su. Plaintiffs describe the conversation as referring to “Mr. Su’s *current* computer,” Su Letter Br. at 10 (emphasis added), but that is not the case. Mr. Su’s only Irico-issued laptop was repurposed in June 2022 and no new laptop was issued given his dismissal from all Irico management positions. The conversation recorded in the transcript Plaintiffs cite was to inform Mr. Su that Irico intended to search his *only* Irico-issued laptop, not a second computer as Plaintiffs imagine. Mr. Su admits in the call transcript that he had begun to work for an unrelated company in Shenzhen even before he officially departed his positions at Irico and that he commingled Irico files with both personal files and files related to this other company on his Irico computer. *See* Taladay Decl., Ex. 3 at 1-2 (proposing that “the data will be filtered and only the data related to your work in Foshan will be transferred overseas”).<sup>2</sup> If Mr. Su is using a computer since his departure from Irico, it is not an Irico device and not subject to collection by Irico. *See* Taladay Decl. ¶ 9.

***Mr. Su did not continue to work for Irico after resigning his management positions.*** Third, Plaintiffs misrepresent what they claim to be examples of Mr. Su “continu[ing] to work for Irico” after June 2022, Su Letter Br. at 9. As described above, Mr. Su was subject to an “Economic

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<sup>2</sup> Despite Mr. Su’s concerns about personal information or confidential information from other companies, Irico collected and ran search terms against all recoverable files on Mr. Su’s former laptop.

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The Honorable Vaughn R. Walker

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Responsibility Audit” following his resignation from his management positions, a common and required practice. Plaintiffs cite communications between Mr. Su and his former subordinate attaching a document entitled “Situation Explanation,” *See* Hwu Decl. Ex. O at IRI-SU-000165E, but Plaintiffs omit the attachment itself from their exhibit. That document actually shows Mr. Su providing an explanation for his expense reimbursements that were under scrutiny as part of his Economic Responsibility Audit, rather than any ongoing work for Irico. *See* Attachment 2 (IRI-SU-000166E). And Plaintiffs’ claim that Mr. Su “continued to use” his Irico email account rests solely on the fact that his account *received* a small number of emails after June 17, 2022. *See* Hwu Decl. Ex. T. To the contrary, there is no evidence that Mr. Su *sent* any emails or even had access to his former Irico email account after resigning from his management positions at Irico.

***Payments to Mr. Su are pursuant to standard mandatory policies and not “leverage.”***

Fourth, as explained in Irico’s Nov. 16, 2023, letter, Mr. Su receives monthly living stipend payments of RMB 6000 under a general Irico policy for former managers who have resigned their positions before reaching age 60 – not in exchange for any ongoing work or responsibilities with Irico. *See* Su Clarification Letter at 3. These payments are non-discretionary under Chinese law governing treatment of managers of state-owned enterprises, and thus reflect neither any kind of special treatment given to Mr. Su nor leverage that Irico could use to compel Mr. Su’s deposition. *See* Attachment 1 at Art. 11 (“The living expenses paid in accordance with Articles 8 and 9 [governing managers leaving their positions before age 60] of these regulations shall be included in the enterprise’s wage fund. The standard for living expenses is to be determined by the enterprise itself but shall not be lower than the minimum standard stipulated by the people’s governments of provinces, autonomous regions, and municipalities directly under the Central Government.”); Su Clarification Letter, Attachment K.

### **III. Terminating or Other Severe Sanctions Remain Unjustified**

Plaintiffs again push their request for terminating or other severe sanctions based on overheated rhetoric and unsupported hyperbole regarding Irico’s intentions as to Mr. Su. As detailed in Irico’s Apr. 21, 2023, opposition and June 9, 2023, sur-reply, such sanctions are warranted only (1) when a party “engaged deliberately in deceptive practices that undermine the integrity of judicial proceedings” or “willfully deceived the court and engaged in conduct utterly inconsistent with the orderly administration of justice,” *Leon v. IDX Sys. Corp.*, 464 F.3d 951, 958 (9th Cir. 2006), and (2) any such misconduct caused such severe prejudice that it “ma[kes] it impossible to decide the case on the merits.” *Atl. Recording Corp. v. Howell*, No. CV-06-02076-PHXNVW, 2008 WL 4080008, at \*2 (D. Ariz. Aug. 29, 2008). The situation regarding Mr. Su meets neither of these essential criteria.

***Mr. Su is not a key witness and his absence does not make it impossible to decide this case on the merits.*** Despite Plaintiffs’ disproportionate focus on Mr. Su, he had – at most – a tangential role with regard to the conduct alleged by Plaintiffs at the heart of this lawsuit. From April 1993 through April 2005 – encompassing the vast majority of the class period – Mr. Su held successive roles in the Irico Group ***Human Resources*** department, a position in which he would

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The Honorable Vaughn R. Walker

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have no influence whatsoever regarding the pricing or production of CRTs, nor any reason to meet with Irco's competitors. *See* Carter Decl. in Support of Irco Opposition to Plaintiffs' Mot. for Discovery Sanctions (Apr. 21, 2023), Ex. Y (IRI-CRT-00031561E). He then served less than two years as Deputy General Manager for Planning of the Irco Group Sales Company, before moving into a purchasing role at Irco Electronics. *Id.* Moreover, of the 82 alleged competitor meetings identified by Plaintiffs as involving Irco and proffered to the Special Master, reflected in the extensive record-keeping of other defendants, only a *single example* mentions Mr. Su. *See* Plaintiffs' Revised Chart in Support of Authentication and Admissibility of Defendants' Documents re Irco Competitor Contacts (Mar. 21, 2022), at Tab 23. As Plaintiffs routinely note, this is far less involvement than other Irco witnesses that *were* made available to Plaintiffs for deposition, meaning Mr. Su is in no way a key witness to the disputed meetings underlying Plaintiffs' allegations against Irco. *See, e.g., id.* at Tabs 4, 5, 6, 7, 11, 13, 31 (alleging attendance at seven competitor meetings by Wang Zhaojie); Plaintiffs' Letter Brief in Support of Proffer of Evidence of CRT Conspiracy (Mar. 21, 2022) at 12 ("Irco's corporate representative, Zhaojie Wang, admitted attending 'many, many such meetings' with competitors."). And Plaintiffs complain that the depositions of these other Irco employees were fruitless. Thus, Plaintiffs' argument that Mr. Su is somehow key to their allegations, and that his unavailability for a deposition requires severe sanctions, falls flat.

On the other side of the scale, Plaintiffs have repeatedly claimed to possess "overwhelming" evidence against Irco, ECF No. 5191 at 12, amassed from over 250 witness depositions, and "tens of thousands" of relevant documents already collected and reviewed from other defendants, ECF No. 6177 at 14-15, including extensive production of documents and testimony from a cooperating defendant (Chunghwa). As the Special Master recalled during the prior hearing on this motion, Plaintiffs have also won a ruling that many such documents that reflect Irco's attendance at competitor meetings are admissible for purposes of summary judgment. ECF No. 6093. There simply is no reason to believe that Mr. Su's testimony would have meaningfully moved the needle when considering his very limited role and the purportedly "strong" evidence that Plaintiffs claim to already possess against Irco. *See* Plaintiffs' Mot. for Discovery Sanctions (Mar. 20, 2023) at 31; *Apple Inc. v. Samsung Elecs. Co.*, 888 F. Supp. 2d 976, 994 (N.D. Cal. 2012) ("[T]he Court finds it hard to difficult to conclude that Apple's 'ability to go to trial' was significantly hampered where discovery in this case has been so voluminous."); *Pension Comm. of Univ. of Montreal Pension Plan v. Banc of America Sec., LLC*, 685 F. Supp. 2d 456 (S.D.N.Y. 2010), 685 F. Supp. 2d at 479 (denying request for adverse inference instruction because "Defendants have gathered an enormous amount of discovery – both from documents and witnesses"), *abrogated on other grounds by Chin v. Port Auth. of N.Y. & N.J.*, 685 F.3d 135, 162 (2d Cir. 2012).

***There was no intentional effort by Irco to prevent Mr. Su's deposition.*** Specific intent to deprive another party of relevant evidence is a threshold requirement for the terminating or other severe sanctions that Plaintiffs seek. *See, e.g., WeRide Corp. v. Kun Huang*, No. 5:18-CV-07233-EJD, 2020 WL 1967209 (N.D. Cal. Apr. 24, 2020) (defendants actively and intentionally deleted evidence while representing the opposite to the court); *Facebook, Inc. v. OnlineNIC Inc.*, No. 19-

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The Honorable Vaughn R. Walker

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CV-07071-SI (SVK), 2022 WL 2289067 (N.D. Cal. Mar. 28, 2022), report and recommendation adopted, No. 19-CV-07071-SI, 2022 WL 17371092 (N.D. Cal. Oct. 17, 2022) (defendants intentionally lied about the existence of data backups and actively deleted over half of the relevant data in its possession while working with a Special Master to have that data collected). Far from meeting this strict standard, the documents cited by Plaintiffs **do not** show a coordinated plan to deceive Plaintiffs regarding Mr. Su's departure, but rather confusion even among Irico's Human Resources staff as to Mr. Su's status: "Xu Jinmei [Irico Foshan HR Director]: ... GM Su officially retired in July [sic]. Shang Xuhang: Are you sure he retired? The definition for retirement is very strict. Xu Jinmei: GM Su retired a long time ago. Didn't GM Zhang take over in July?" Hwu Decl. Ex. F at IRI-SU-001356E. Mr. Su may very well have taken advantage of separate, unconnected processes for his request to resign his management positions and the Irico Group legal department's efforts to plan his travel for deposition in 2022 to secure the former and escape the latter. But that does not equate to an intentional effort by Irico to deprive the court of relevant evidence – particularly given Mr. Su's relative lack of importance in Irico's CRT operations during the relevant time period.

Because they neither make this case impossible to decide on the merits nor reflect any intentional effort by Irico to deprive Plaintiffs of relevant discovery, Mr. Su's refusal to sit for deposition and departure from Irico cannot be a basis for terminating or other severe sanctions. *See Leon*, 464 F.3d at 958; *Atlantic Record Corp.*, 2008 WL 4080008, at \*2.

\* \* \*

The Special Master should deny Plaintiffs' request for terminating sanctions and their alternate request for adverse inference, striking of defenses, and other extreme sanctions.

Sincerely,  
/s/ John Taladay  
John Taladay

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Daniel E. Birkhaeuser (dbirkhaeuser@bramsonplutzik.com)

# Attachment 1



November 28, 2023

**Certification**

**Welocalize Translations**

**TRANSLATOR'S DECLARATION:**

I, **Johnson Wong**, hereby declare:

That I possess advanced knowledge of the Chinese and English languages. The attached Chinese into English translation has been translated by me and to the best of my knowledge and belief, it is a true and accurate translation of:

国有企业富余职工安置规定

*(Digital or printed signature here above the line)*

A handwritten signature in black ink, appearing to read "J. Wong", written over a horizontal line.

**Johnson Wong**

Project Number: BBLLP\_2311\_P0045

15 W. 37th Street 4th Floor  
New York, NY 10018  
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**Regulations on the Placement of Surplus Staff in State-Owned Enterprises**

Enacting Body:	<a href="#">State Council</a>
Document No.:	Order No. 111 of the State Council of the People's Republic of China
Date of Publication:	April 20, 1993
Effective Date:	April 20, 1993
Validity:	<a href="#">Currently valid</a>
Hierarchy of Authority:	<a href="#">Administrative Regulation</a>
Category of Law:	<a href="#">State-Owned Enterprises, Labor and Union Comprehensive Regulations</a>

Order of the State Council of the People's Republic of China

(No. 111)

The "Regulations on the Placement of Surplus Staff in State-Owned Enterprises" have been passed at the 115<sup>th</sup> executive meeting of the State Council. They are hereby promulgated and shall come into effect from the date of publication.

Premier: Li Peng

April 20, 1993

(missing the translation of the watermark: seal of PKULAW.COM, Love Law and Have Future)

Regulations on the Placement of Surplus Staff in State-Owned Enterprises

**Article 1:** To properly place surplus staff in state-owned enterprises, enhance the vitality of these enterprises, and improve their economic efficiency, these regulations have been established.

**Article 2:** The placement of surplus staff in state-owned enterprises (hereinafter referred to as "enterprises") shall adhere to the principle of primarily self-placement by the enterprises, supplemented by societal assistance, and ensuring the basic livelihood of the surplus staff.

**Article 3:** Enterprises shall follow these regulations to place surplus staff by expanding various business operations, organizing labor activities, developing tertiary industries, making comprehensive use of resources, and other measures.

Enterprise administrative departments, labor administrative departments, and trade union organizations shall guide, assist, and support the enterprises in the placement of surplus staff, actively creating conditions, cultivating and improving the labor market, and opening up societal placement channels.

**Article 4:** Enterprises that establish independently accounting enterprises in the tertiary sector for the placement of surplus staff shall be exempt from enterprise income tax for two years following their opening, and then receive a 50% enterprise income tax reduction for the following three years.

**Article 5:** Labor employment service businesses established by enterprises shall undertake the task of placing surplus staff from their own enterprises. The enterprises shall provide support in terms of funding, premises, raw materials, and equipment according to the state's regulations on the management of state-owned assets.

**Article 6:** Enterprises can organize their surplus staff to establish independently accounting enterprises according to the law to undertake technical renovations or labor projects that were previously contracted out to other organizations.

**Article 7:** Enterprises can place surplus staff on waiting-for-employment status and provide them with retraining. The salary during the training period is determined by the enterprises themselves.

**Article 8:** With the discussion and agreement of an enterprise's employee representative assembly and after filing with the enterprise's administrative department, the enterprise may grant its employees a limited period of leave. During this leave, the enterprise shall provide living expenses to the employees.

Pregnant or nursing female employees may, upon their request, be granted a leave of up to two years, during which the enterprise will provide living expenses. If this leave includes maternity leave, the salary during the maternity leave period will be paid in accordance with state regulations.

**Article 9:** Employees who are less than five years from the retirement age can, upon their application and with the approval of the enterprise leadership, leave their job positions for rest. During this rest period, the enterprise shall provide living expenses. In areas where retirement expenses are collectively managed, both the enterprise and the employees taking leave for rest shall pay basic old-age insurance premiums according to relevant regulations. When employees reach the national retirement age during their rest period, retirement procedures shall be completed as per regulations. The period of leave for rest is considered part of the employee's length of service and is combined with their previous years of service for calculation.

**Article 10:** Employees may apply for resignation. Employees whose resignation is approved by the enterprise shall receive a one-time living subsidy from the enterprise at the time of completing the resignation procedures, in accordance with national regulations.



**Article 11:** The living expenses paid in accordance with Articles 8 and 9 of these regulations shall be included in the enterprise's wage fund. The standard for living expenses is to be determined by the enterprise itself but shall not be lower than the minimum standard stipulated by the people's governments of provinces, autonomous regions, and municipalities directly under the Central Government.

**Article 12:** If an enterprise needs to lay off employees due to significant changes in production and business operations, it may terminate labor contracts with contract-based employees ahead of schedule subject to discussion and agreement by the enterprise's employee representative assembly. The enterprise must fulfill the obligations stipulated in the contract. If the contract does not specify terms for early termination, the enterprise shall provide compensation to the employees whose labor contracts are terminated early. The compensation shall be equivalent to one month's standard wage for each year of service in the enterprise.

**Article 13:** Labor administrative departments at all levels and enterprise administrative departments shall effectively handle the social placement and adjustment of surplus staff, encouraging and assisting surplus staff to organize for employment and self-employment. The transfer of staff between enterprises can be either permanent or temporary; in the case of temporary transfer, the salary and welfare benefits during the transfer period shall be agreed upon in a contract between the two enterprises.

**Article 14:** Surplus staff who face challenges in securing employment in society and are unable to receive enterprise-provided placement are entitled to unemployment insurance benefits during their period of unemployment in accordance with the law. Labor administrative authorities and relevant administrative departments shall create conditions to facilitate the re-employment of these workers.

**Article 15:** Workers placed in independently accounting enterprises established by enterprises in accordance with these regulations shall be included in the statistical data of employee headcount and economic indicators of the new enterprises, as per national regulations.

**Article 16:** Provincial, autonomous region, and municipal people's governments may develop implementation methods based on these regulations.

**Article 17:** These regulations are subjected to the interpretation by the labor administrative department of the State Council.

**Article 18:** These regulations shall be implemented from the date of publication.

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Original Link: <https://www.pkulaw.com/chl/f474451fa1dfe21bbdfb.html>

## 国有企业富余职工安置规定

制定机关：	国务院
发文字号：	中华人民共和国国务院令 第111号
公布日期：	1993.04.20
施行日期：	1993.04.20
时效性：	现行有效
效力位阶：	行政法规
法规类别：	国有企业 劳动工会综合规定

中华人民共和国国务院令

（第111号）

《国有企业富余职工安置规定》已经国务院第一百一十五次常务会议通过，现予发布，自发布之日起施行。

总理 李鹏

一九九三年四月二十日

## 国有企业富余职工安置规定

**第一条** 为了妥善安置国有企业富余职工，增强企业活力，提高企业经济效益，制定本规定。

**第二条** 安置国有企业（以下简称企业）中的富余职工，应当遵循企业自行安置为主、社会帮助安置为辅，保障富余职工基本生活的原则。

**第三条** 企业安置富余职工应当依照本规定采取拓展多种经营、组织劳务活动、发展第三产业、

综合利用资源和其它措施。

企业行政主管部门、劳动行政主管部门和工会组织应当指导、帮助和支持企业做好富余职工安置工作，积极创造条件，培育和完善劳务市场，开辟社会安置渠道。

**第四条** 企业为安置富余职工而兴办的从事第三产业的独立核算企业，自开业之日起两年免征、三年减半征收企业所得税。

**第五条** 企业开办的劳动就业服务企业，应当承担安置本企业富余职工的任务。企业应当按照国家有关国有资产管理的规定，在资金、场地、原材料和设备等方面给予扶持。

**第六条** 企业组织本企业富余职工依法兴办的独立核算企业，可以承担本企业中原由外单位承包的技术改造或者劳务项目。

**第七条** 企业可以对富余职工实行待岗和转业培训，培训期间的工资待遇由企业自行确定。

**第八条** 经企业职工代表大会讨论同意并报企业行政主管部门备案，企业可以对职工实行有限期的放假。职工放假期间，由企业发给生活费。

孕期或者哺乳期的女职工，经本人申请，企业可以给予不超过二年的假期，放假期间发给生活费。假期内含产假的，产假期间按照国家规定发给工资。

**第九条** 职工距退休年龄不到五年的，经本人申请，企业领导批准，可以退出工作岗位休养。职工退出工作岗位休养期间，由企业发给生活费。已经实行退休费用统筹的地方，企业和退出工作岗位休养的职工应当按照有关规定缴纳基本养老保险费。职工退出工作岗位休养期间达到国家规定的退休年龄时，按照规定办理退休手续。职工退出工作岗位休养期间视为工龄，与其以前的工龄合并计算。

**第十条** 职工可以申请辞职。经企业批准辞职的职工，在办理辞职手续时，企业应当按照国家有关规定发给一次性生活补助费。

**第十一条** 按照本规定第八条、第九条规定发放的生活费在企业工资基金中列支，生活费标准由企业自主确定，但是不得低于省、自治区、直辖市人民政府规定的最低标准。

**第十二条** 企业因生产经营发生重大变化，必须裁减职工的，对劳动合同制职工，经企业职工代表大会讨论同意，可以提前解除劳动合同，但是应当按照合同约定履行义务；合同没有约定的，企业对被提前解除劳动合同的职工，按照其在本企业工作的年限，工龄每满一年，发给相当于本人一个月标准工资的补偿费。

**第十三条** 各级劳动行政主管部门和企业行政主管部门应当做好富余职工的社会安置和调剂工作，鼓励和帮助富余职工组织起来就业和自谋职业。企业之间调剂职工，可以正式调动，也可以临时借调；临时借调的，借调期间的工资和福利待遇由双方企业在协议中商定。

**第十四条** 富余职工由企业自行安置有困难到社会待业的，在待业期间，依法享受待业保险待遇。劳动行政主管部门和有关行政主管部门应当创造条件，帮助职工再就业。

**第十五条** 企业依照本规定兴办的独立核算企业安置的职工，按照国家有关规定纳入新办企业的职工人数和经济指标的统计范围。

**第十六条** 省、自治区、直辖市人民政府可以根据本规定制定实施办法。

**第十七条** 本规定由国务院劳动行政主管部门负责解释。

**第十八条** 本规定自发布之日起施行。

法宝快讯：如何快速找到您需要的检索结果？法宝 V6 有何新特色？



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# Attachment 2



November 28, 2023

**Certification**

**Welocalize Translations**

**TRANSLATOR'S DECLARATION:**

I, **Johnson Wong**, hereby declare:

That I possess advanced knowledge of the CHINESE and English languages. The attached CHINESE into English translation has been translated by me and to the best of my knowledge and belief, it is a true and accurate translation of the document with bates numbers range: IRI-SU-000166 – IRI-SU-000168

*(Digital or printed signature here above the line)*

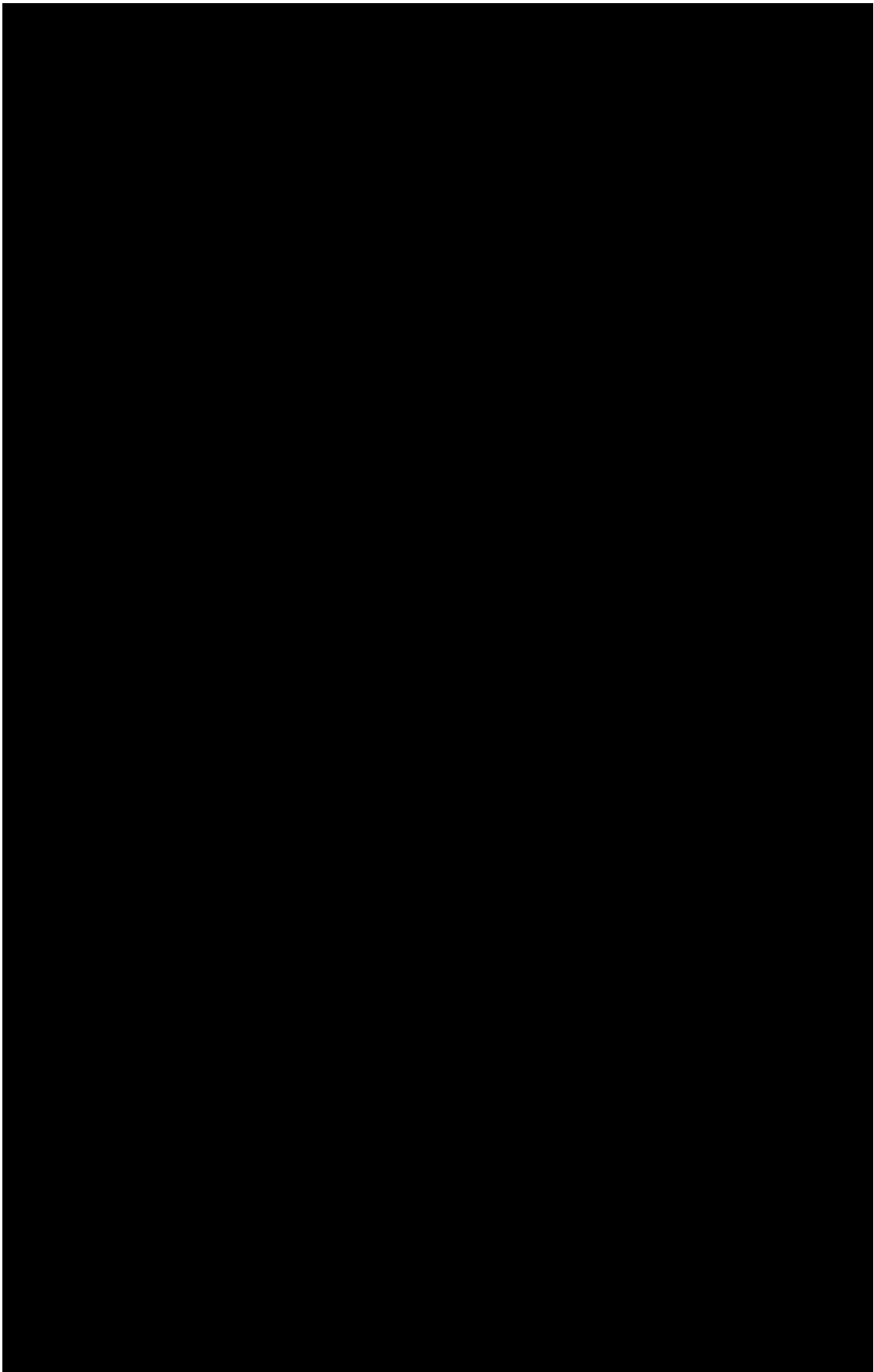
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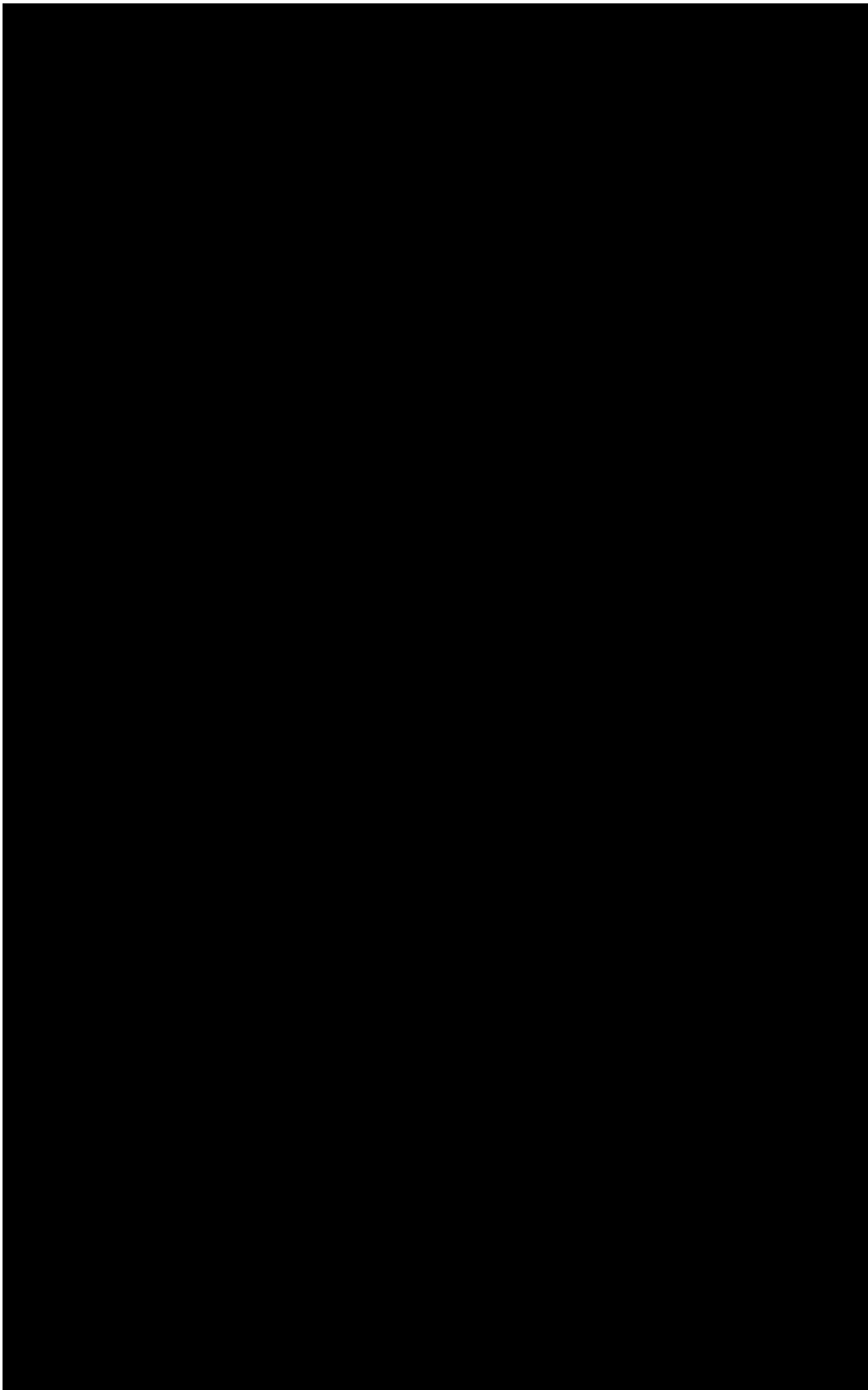
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Project Number: BBLLP\_2311\_P0046

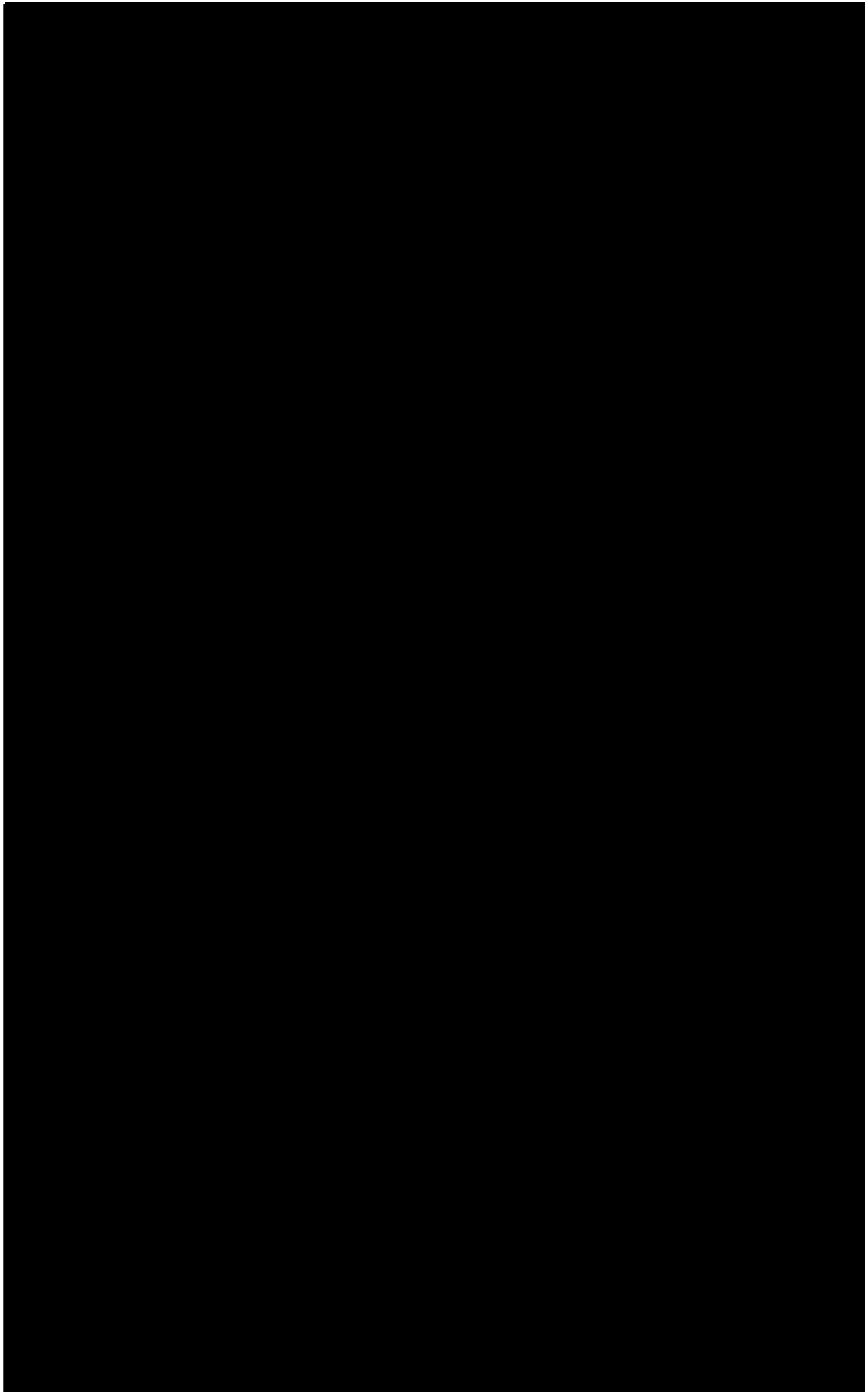
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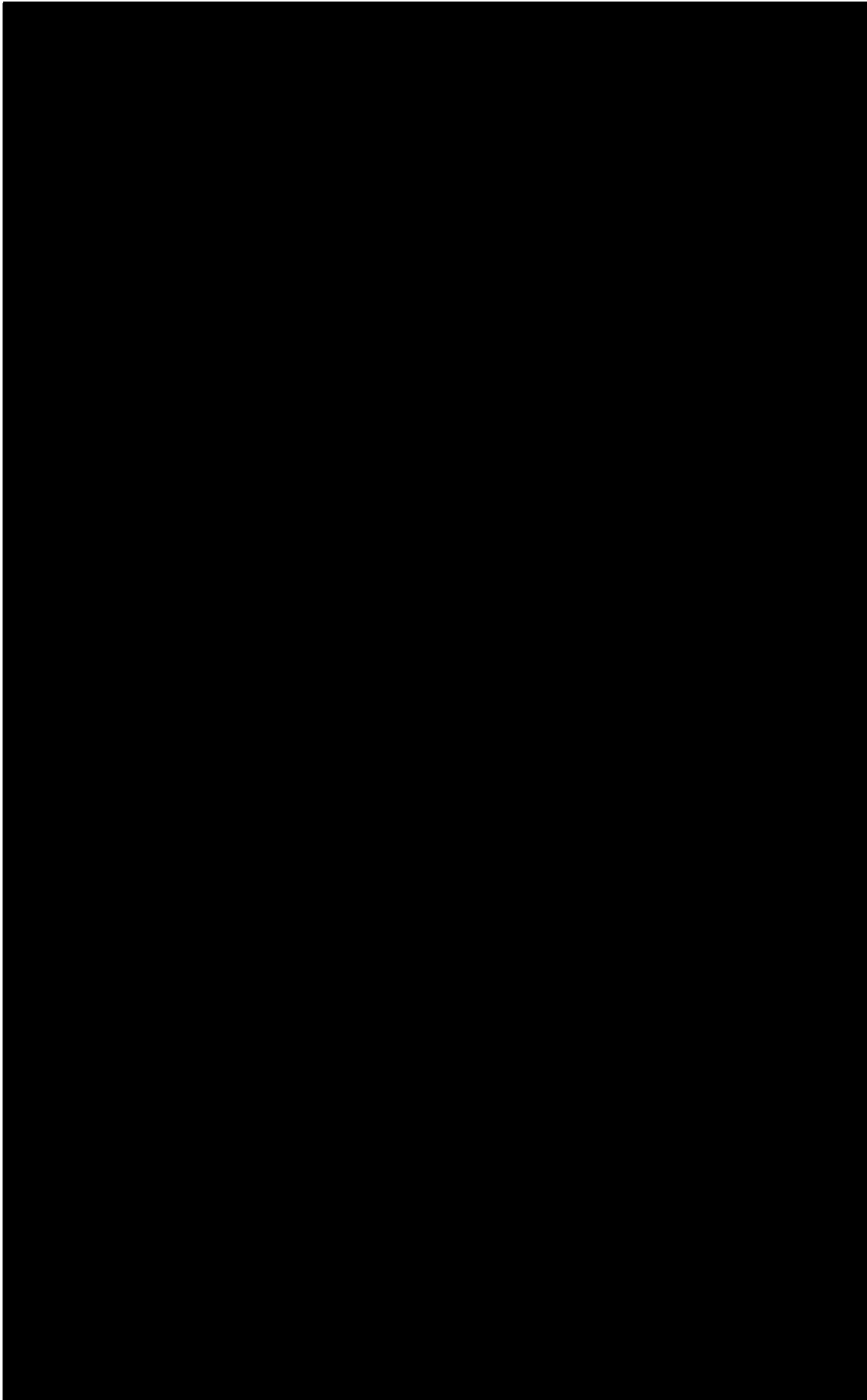














# **DOCUMENT 28**

**SAVERI & SAVERI, INC.**

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December 14, 2023

**VIA EMAIL**

The Honorable Vaughn R. Walker  
Law Office of Vaughn R. Walker  
Four Embarcadero Center, Suite 2200  
San Francisco, CA 94111  
vrw@judgewalker.com

Re: *In re Cathode Ray Tube (CRT) Antitrust Litigation* – MDL No. 1917,  
Master File No. 07-CV-5944-JST

Dear Judge Walker:

In response to Your Honor's inquiry at the December 12, 2023 hearing and in support of their pending Motion for Terminating or Alternative Sanctions, Direct Purchaser Plaintiffs ("DPPs") and Indirect Purchaser Plaintiffs ("IPPs") (together, "Plaintiffs") contend that Defendants Irico Group Corporation and Irico Display Devices Co., Ltd. violated the following Orders of the Court, with references to Plaintiffs' briefs where discussed:

1. Pretrial Order No. 1 (ECF No. 230). Motion at 1, 4–10, 23, 27–28; Reply at 8, 13–14.
2. Special Master's Order re DPPs' Motion for Jurisdictional Discovery (ECF No. 5320; adopted at ECF No. 5324). Motion at 21; Reply at 23.
3. Order Granting DPPs' Motion to Compel Compliance with 8/2/2018 Order re Jurisdictional Discovery (ECF No. 5331; adopted by ECF No. 5352). Motion at 21; Reply at 23.
4. Special Master's Order re DPPs' Motion to Compel Responses to Interrogatories Nos 4 & 5 (ECF No. 5919). Motion at 21; Reply at 22–23.
5. Order re DPPs' Motion to Compel Interrogatory Further Answers. ECF No. 5944. Motion at 21; Reply at 22–23.



The Honorable Vaughn R. Walker

12/14/2023

Page 2

6. May 25, 2022 Stipulation and Order re: Case Schedule (ECF No. 6016). Motion at 16–19; Reply at 18–21; Plaintiffs’ Nov. 16 Brief at 1–10.
7. August 11, 2022 Hearing Transcript Order (ECF No. 6047). Motion at 16–19; Reply at 18–21; Plaintiffs’ Nov. 16 Brief at 1–10.
8. Order Adopting Special Master’s Report & Recommendation on Irico’s Failure to Produce Su Xiaohua for Deposition (ECF No 6115, “Su Order”). Reply at 14–17; Plaintiffs’ Nov. 16 Brief at 1–4, 10.
9. Order Approving Special Master’s Interim Report & Recommendation on Plaintiffs’ Motion for Discovery Sanctions (ECF No. 6264). Plaintiffs’ Nov. 16 Brief at 1, 4–5, 10.
10. Order Approving as Modified Special Master’s Second Interim Report & Recommendation on Plaintiffs’ Motion for Discovery Sanctions (ECF No. 6324). Plaintiffs’ Nov. 16 Brief at 1, 4–5, 10.

Very truly yours,

*/s/ R. Alexander Saveri*

R. Alexander Saveri  
Lead Counsel for Direct Purchaser Plaintiffs

*/s/ Lauren C. Capurro*

Lauren C. Capurro  
Lead Counsel for Indirect Purchaser Plaintiffs

Cc: Tanveer Singh (tanveer.singh@fedarb.com)  
Jackie Nakamura (jnn@wnadr.com)  
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# DOCUMENT 29

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December 18, 2023

CONFIDENTIAL

VIA E-MAIL [VRW@JUDGEWALKER.COM]

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The Honorable Vaughn R. Walker  
Law Office of Vaughn R. Walker  
Four Embarcadero Center, Suite 2200  
San Francisco, CA 94111

Re: In re Cathode Ray Tube (CRT) Antitrust Litigation, MDL No. 1917, Master File  
No. 07-CV-944-JST

Dear Judge Walker:

Defendants Irico Group Corp. and Irico Display Devices Co., Ltd. (collectively, "Irico") write in response to Plaintiffs' December 14, 2023, letter regarding the pending motion for sanctions against Irico (the "Dec. 14 Letter"). Plaintiffs' vastly overreaching Dec. 14 Letter lists court orders that Irico is alleged to have violated with citations to Plaintiffs' various submissions in support of their motion for sanctions. In the attached chart, to incorporate everything in one place for convenience, Irico compiles the information provided in the Dec. 14 letter and adds corresponding citations to Irico's responsive submissions in which Irico demonstrates that each order was not violated. Irico's relevant submissions are also enclosed, with the cited portions annotated.

If Your Honor has any questions regarding the attached chart, please do not hesitate to contact me.

Sincerely,

/s/ John M. Taladay  
John M. Taladay

cc: Tanveer Singh (tanveer.singh@fedarb.com)  
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The Honorable Vaughn R. Walker

- 2 -

<b>Order</b>	<b>Plaintiffs Citation</b>	<b>Irico Citation</b>	<b>Explanatory Note</b>
Pretrial Order No. 1 (ECF No. 230)	Motion at 1, 4–10, 23, 27–28; Reply at 8, 13–14.	Irico Opposition (Apr. 21, 2023) at 12-21.	
Special Master’s Order re DPPs’ Motion for Jurisdictional Discovery (ECF No. 5320; adopted at ECF No. 5324).	Motion at 21; Reply at 23.	Irico Opposition (Apr. 21, 2023) at 40-41.	
Order Granting DPPs’ Motion to Compel Compliance with 8/2/2018 Order re Jurisdictional Discovery (ECF No. 5331; adopted by ECF No. 5352)	Motion at 21; Reply at 23.	Irico Opposition (Apr. 21, 2023) at 42-43.	
Special Master’s Order re DPPs’ Motion to Compel Responses to Interrogatories Nos 4 & 5 (ECF No. 5919).	Motion at 21; Reply at 22–23.	Irico Opposition (Apr. 21, 2023) at 43.	
Order re DPPs’ Motion to Compel Interrogatory Further Answers (ECF No. 5944)	Motion at 21; Reply at 22–23.	Irico Opposition (Apr. 21, 2023) at 43.	Plaintiffs’ citation refers only to an alleged violation of ECF No. 5919. This order (ECF No. 5944) merely set a tentative briefing schedule for submissions on admissibility of alleged competitor meeting minutes, with which the parties complied.

**BAKER BOTTS** LLP

The Honorable Vaughn R. Walker

- 3 -

<b>Order</b>	<b>Plaintiffs Citation</b>	<b>Irico Citation</b>	<b>Explanatory Note</b>
May 25, 2022 Stipulation and Order re: Case Schedule (ECF No. 6016)	Motion at 16–19; Reply at 18–21; Plaintiffs’ Nov. 16 Brief at 1–10.	Irico Opposition (Apr. 21, 2023) at 29-30; Irico Letter re Su Clarifications (Nov. 16, 2023) at 1-3; Irico Response to Plaintiffs’ Supplemental Letter Brief (Nov. 28, 2023) at 1-9.	
August 11, 2022 Hearing Transcript Order (ECF No. 6047)	Motion at 16–19; Reply at 18–21; Plaintiffs’ Nov. 16 Brief at 1–10.	Irico Opposition (Apr. 21, 2023) at 29-30; Irico Letter re Su Clarifications (Nov. 16, 2023) at 1-3; Irico Response to Plaintiffs’ Supplemental Letter Brief (Nov. 28, 2023) at 1-9.	
Order Adopting Special Master’s Report & Recommendation on Irico’s Failure to Produce Su Xiaohua for Deposition (ECF No 6115, “Su Order”)	Reply at 14–17; Plaintiffs’ Nov. 16 Brief at 1–4, 10.	Irico Response to Plaintiffs’ Supplemental Letter Brief (Nov. 28, 2023) at 4.	
Order Approving Special Master’s Interim Report & Recommendation on Plaintiffs’ Motion for Discovery Sanctions (ECF No. 6264)	Plaintiffs’ Nov. 16 Brief at 1, 4–5, 10.	Irico Letter re Status Update, Search Terms Dispute, and Request for Extension (Oct. 9, 2023) at 4-6; Taladay Declaration (Oct. 23, 2023) at ¶¶ 1-32; Irico Response to Plaintiffs’ Supplemental Letter Brief (Nov. 28, 2023) at 5-6.	

**BAKER BOTTS** LLP

The Honorable Vaughn R. Walker

- 4 -

Order	Plaintiffs Citation	Irico Citation	Explanatory Note
Order Approving as Modified Special Master's Second Interim Report & Recommendation on Plaintiffs' Motion for Discovery Sanctions (ECF No. 6324)	Plaintiffs' Nov. 16 Brief at 1, 4-5, 10.	Irico Letter re Status Update, Search Terms Dispute, and Request for Extension (Oct. 9, 2023) at 4-6; Taladay Declaration (Oct. 23, 2023) at ¶¶ 1-32; Irico Response to Plaintiffs' Supplemental Letter Brief (Nov. 28, 2023) at 5-6.	

# **DOCUMENT 30**

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**WASHINGTON**

February 8, 2024

VIA E-MAIL [VRW@JUDGEWALKER.COM]

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Law Office of Vaughn R. Walker  
Four Embarcadero Center, Suite 2200  
San Francisco, CA 94111

Re: In re Cathode Ray Tube (CRT) Antitrust Litigation, MDL No. 1917, Master File  
No. 07-CV-944-JST

Dear Judge Walker:

Defendants Irico Group Corp. and Irico Display Devices Co., Ltd. (collectively, “Irico”) write with respect to Your Honor’s Report and Recommendation on Discovery Search Terms dated January 31, 2024 (ECF No. 6351) (“Search Terms Order”), to request an extension until March 25, 2024, to comply with that order.

As explained in more detail below and in the attachments, the review required by the additional search parameters is extensive. A preliminary analysis of the search terms required by the Search Terms Order indicates that approximately 28,000 documents—three times the volume of documents previously reviewed for production in October 2023—will require review. As previously explained, this process first requires full review of the documents (in mainland China) for Chinese state secrets. All cleared documents must then be exported to the United States, followed by a full review for responsiveness of the documents (nearly all of which are expected to be in Chinese) in the United States. Conducting this process in the most expeditious manner will require several additional weeks beyond the current February 23, 2024, deadline. *See* Taladay Decl. Regarding Compliance with Interim Orders on Plaintiffs’ Motion for Discovery Sanctions (Nov. 23, 2023) (“Taladay Decl.”) at ¶¶ 26-31. Moreover, Irico’s ability to execute on the processing and review of these documents will be delayed by the Chinese New Year holiday, a major holiday also known as the Spring Festival, during which Irico, its eDiscovery vendor, and the Chinese law firm tasked with conducting a state secrets review will all be closed for over a week, a shutdown in China that has already begun. An extension to March 25 would allow for approximately five weeks to fully comply with the Search Terms Order following the end of the holiday, a target that will require expeditious processing and review of the additional 28,000 documents but which Irico believes can be accomplished.

Irico has met and conferred with Plaintiffs regarding the proposed extension and shared the attached search term reports. Plaintiffs offered an extension of only one week, which would not



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be sufficient to comply with the Search Terms Order for the reasons explained herein. After receipt of the attached search term reports, Plaintiffs also rejected Irico's proposal to request modification of the search terms to reduce the number of documents that would need to be reviewed and better target those that might contain relevant materials.

### **1. Results of Preliminary Search Term Analysis and Comparison to Prior Productions**

Irico's eDiscovery vendor (BDO) was able to access the pre-existing database of documents before the Chinese New Year holiday and has completed a preliminary analysis of the 32 additional search terms<sup>1</sup> listed in the Search Terms Order. The vendor has determined that these terms hit on approximately 28,000 incremental files, comprised of approximately 10,400 emails with attachments and 17,700 internal text messages with attachments. *See* Attachment A (email search term report); Attachment B (internal text message search term report).<sup>2</sup> These additional 28,000 search hits and attachments *exclude* the documents previously reviewed and so represent new files that must be assessed for Chinese state secrets in China and responsiveness in the U.S. before they can be produced. In total, this is approximately thrice the size of the original 9,400 files that Irico reviewed for the October 2023 productions to Plaintiffs.

Irico's recent experience with coordinating such a cross-border document review and production efforts confirms that additional time will be needed to fully comply with the Search Terms Order. The October 2023 review process involved a total of around 9,400 files and required approximately four weeks from the start of review for Chinese state secrets to the completion of the final production to Plaintiffs. While the total new volume of documents for review is substantially higher than in October 2023, Irico believes it can take steps to expedite the process and complete it by March 25, 2024, an extension of just over four weeks.

### **2. Intervening Chinese New Year Holiday**

Irico's efforts to comply with the Search Terms Order are also complicated by the Chinese New Year holiday. The national holiday officially runs for eight days from February 10 through 17, 2024, but much of the country, including those necessary to complete this process, have already begun to shut down. Beginning this week and through February 17, Irico, BDO (Irico's eDiscovery vendor), and AnJie Broad (the Chinese law firm conducting Chinese state secrets

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<sup>1</sup> The Search Terms Order listed 32 distinct terms in English, but three of those terms ("CRT," "Depart from Post," and "Postpone") have two versions each in the original list of Plaintiffs' proposed terms, either distinct Chinese and English versions or two synonyms in Chinese, resulting in a total of 35 incremental search terms.

<sup>2</sup> Running these search reports required coordination between Irico and eDiscovery vendor personnel, travel to the server location, rebooting and reconstituting the server, and running the search term reports, a process that took approximately four days.

**BAKER BOTTS** LLP

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review) will be closed, with a large number of employees already unavailable due to previously planned travel.<sup>3</sup>

As such, review in China of the 28,000 identified documents cannot begin until the week of February 19, 2024. And because all documents must clear a Chinese state secrets review by qualified Chinese counsel before being released to the U.S. or reviewed by U.S.-based lawyers, see Taladay Decl. ¶¶ 26-28 (describing requirements under Chinese law), Irco's U.S. counsel cannot begin work until the state secrets review is completed and approved for export to a U.S.-based server. Under the current deadline of February 23, 2024, this leaves only five business days (from February 19 to February 23) to complete both the China-side state secrets review and U.S.-side responsiveness review and then prepare any responsive documents for production—which cannot be done based on past experience. The requested extension to March 25 allows for approximately five working weeks after conclusion of the Chinese New Year holiday, still an ambitious but realistic schedule to conduct the necessary reviews and production.

Thank you for your consideration of Irco's requested extension, until March 25, 2024, to comply with the Search Terms Order.

Sincerely,  
*/s/ John Taladay*  
John Taladay

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<sup>3</sup> See China Public Holiday 2024 Schedule Released, China Briefing (Oct. 25, 2023), <https://www.china-briefing.com/news/china-public-holiday-2024-schedule/>; Chunyun – Spring Festival Travel Rush in China, Travel China Guide, <https://www.travelchinaguide.com/china-trains/spring-festival-rush.htm> (describing “the largest human migration on earth happening annually” beginning two weeks before the Chinese New Year holiday).

# Attachment A



## Irico

### New Special Master Search Terms

#### Results Summary - Email Data

Total documents with hits, excluding docs already reviewed	Total documents with hits, family included, excluding docs already reviewed
5782	10377

#### New Terms List

Term	Documents with hits, excluding docs already reviewed	Documents with hits (families included), excluding docs already reviewed	Unique hits, excluding docs already reviewed	Translation/Note
美国法院	20	40	0	American Courts
反垄断	399	1,051	7	Antitrust
加州	41	119	1	California
彩管	330	2,113	38	CRT
CRT	906	1,858	253	CRT
承诺书	40	166	11	Declaration of personnel traveling abroad
离岗	40	231	10	Depart from Post
离职	567	1,422	47	Depart from Post
取证	102	358	15	deposition
证据	965	2,622	6	Evidence
联邦法院	6	9	0	federal court
苏总	0	0	0	GM Su
香港	1,157	3,743	400	Hong Kong
诉讼	1,017	2,716	108	Litigation
澳门	122	454	1	Macau
延	1,680	5,932	606	Postpone
缓	238	1,055	51	Postpone
辞职	83	481	2	Quit
返聘	21	301	3	Rehire
退休	597	2,488	45	Retire
养老	365	1,666	212	Retirement
苏晓华	40	47	5	Su Xiaohua
sxh	359	366	0	Su Xiaohua's email ID
"100751"	0	0	0	Su Xiaohua's employee number
	22	22	0	Su Xiaohua's ID number
mail(sxh@ch.com.cn)	359	366	0	Su Xiaohua's work email
作证	323	589	1	testify
通行证	51	149	1	Travel permit
王昭杰	97	257	8	Wang Zhaojie
wzj-xs	2	10	0	Wang Zhaojie's email ID
证人	433	857	12	witness
闫云龙	673	1,617	14	Yan Yunlong
张文凯	1,610	5,055	10	Zhang Wenkai
百尺竿头	4	13	0	Zhang Wenkai's WeChat alias
zhangwenkai0713	2,203	7,505	420	Zhang's email ID

# Attachment B



## Irico

### New Special Master Search Terms

#### Results Summary - Blue Message Data

Total documents with hits, excluding docs already reviewed	Total documents with hits, family included, excluding docs already reviewed
11048	17735

#### New Terms List

Term	Documents with hits, excluding docs already reviewed	Documents with hits (families included), excluding docs already reviewed	Unique hits, excluding docs already reviewed	Translation/Note
美国法院	107	204	0	American Courts
反垄断	708	1,676	16	Antitrust
加州	120	553	2	California
彩管	505	1,223	113	CRT
CRT	787	1,940	95	CRT
承诺书	396	1,672	185	Declaration of personnel traveling abroad
离岗	739	1,762	57	Depart from Post
离职	1,245	3,153	220	Depart from Post
取证	265	1,047	63	deposition
证据	647	2,122	48	Evidence
联邦法院	63	162	0	federal court
苏总	217	270	94	GM Su
香港	1,406	3,888	471	Hong Kong
诉讼	1,661	4,443	425	Litigation
澳门	340	1,112	24	Macau
延	3,434	8,362	1,432	Postpone
缓	1,095	3,412	494	Postpone
辞职	662	2,097	29	Quit
返聘	310	886	14	Rehire
退休	2,518	5,861	481	Retire
养老	482	1,156	79	Retirement
苏晓华	878	958	369	Su Xiaohua
sxh	6	6	0	Su Xiaohua's email ID
"100751"	68	68	0	Su Xiaohua's employee number
	41	41	1	Su Xiaohua's ID number
mail(sxh@ch.com.cn)	6	6	0	Su Xiaohua's work email
作证	478	1,542	15	testify
通行证	248	854	81	Travel permit
王昭杰	554	2,106	130	Wang Zhaojie
wzj-xs	1	1	0	Wang Zhaojie's email ID
证人	485	1,640	8	witness
闫云龙	1,033	2,636	285	Yan Yunlong
张文凯	1,766	3,398	851	Zhang Wenkai
百尺竿头	11	25	0	Zhang Wenkai's WeChat alias
zhangwenkai0713	29	66	1	Zhang's email ID

# DOCUMENT 31

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February 9, 2024

**VIA EMAIL**

The Honorable Vaughn R. Walker  
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Re: *In re Cathode Ray Tube (CRT) Antitrust Litigation* – MDL No. 1917,  
Master File No. 07-CV-5944-JST

Dear Judge Walker:

The Indirect Purchaser Plaintiffs (“IPPs”) and the Direct Purchaser Plaintiffs (“DPPs”) (together “Plaintiffs”) write to respond to the request by defendants Irico Group Corp. and Irico Display Devices Co., Ltd.’s (“Irico”) for a four-week extension of the February 23, 2024 deadline set by Your Honor in the Special Master’s Report & Recommendation on Discovery Search Terms, ECF No. 6351 (the “Search Terms Order”) for the production of additional documents. While Plaintiffs have agreed to a one-week extension to account for the one-week Chinese New Year holiday, Plaintiffs oppose the requested four-week extension as excessive and unnecessary.

Your Honor issued the Search Terms Order on January 31, 2024. It is now February 9, 2024—over a week later—and other than run the search terms identified by Your Honor, Irico’s letter indicates that it has done nothing to start its review. Rather, it has focused its attention on attempting to justify an overlong extension, asserting that no review can begin until February 19, *after* the Chinese New Year holiday, and nearly *three weeks* after the Search Terms Order was issued. This is untenable.

Irico’s present claim that it needs a month’s extension to comply with Your Honor’s Order is inconsistent with its prior representations. Irico previously assured Your Honor that it had “collected and preserved” *all* documents that hit on Plaintiffs’ search terms without “Su qualifiers,” and that those documents “remain[ed] on the China-based Relativity server awaiting the Special Master’s decision.” Declaration of John Taladay dated Oct. 23, 2023 (“Taladay Decl.”), ¶ 25. Thus, it should have been a simple matter to run the searches required by the Search Term Order and immediately begin the state secrets



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review last week. The Chinese New Year Holiday does not start until February 10, 2024.<sup>1</sup> Therefore, an entire week and one-half of review could have been completed before the holiday, so that at least some documents could have been sent to Baker Botts for responsiveness review and production by the February 23, 2024 deadline.

Instead, Irico now informs the Court that it shut down the Relativity server containing the results of Plaintiffs' search terms, requiring four days of coordination between Irico and the eDiscovery vendor to reboot it and run the searches required by the Search Term Order. *See* Feb. 8, 2024 Letter at 2 n.2. Irico does not explain and cannot justify why it shut down the server, knowing that it could and likely would be required to produce additional documents.

Next, Irico claims (without support)<sup>2</sup> that both Irico and the Chinese law firm responsible for the state secrets review are closing early this week for the holiday. Notably, Irico is vague regarding exactly when the offices closed, and provides no explanation for why *no* state secret review has begun. Nor does Irico explain why it did not perform a state secret review in anticipation of possibly being required to produce additional documents. Rather, consistent with its past practice, Irico uses these manufactured discovery disputes as an instrument for further delay.

Plaintiffs submit that Irico's failure to even attempt to comply with the deadline set in the Search Terms Order once again displays its disregard for this Court's authority. Irico also appears to be using the Chinese New Year holiday as a pretext to further delay these proceedings. IPPs have once again lost their trial date as a result of Irico's delays, and DPPs will be in danger of losing theirs if Irico is permitted to drag these proceedings out for another few months. In addition, IPPs intend to seek a new trial date in July 2024. Irico should not be permitted to further prejudice Plaintiffs by unnecessarily causing further delays.

Finally, Plaintiffs also question Irico's assertions regarding the length of time it will take to complete this review. Irico fails to state whether it has de-duped the search results it reports, which would have the potential to dramatically reduce the number of documents to be reviewed.<sup>3</sup> In addition, Irico provides no information regarding the number of people it is assigning to the review. It goes without saying that additional reviewers would assist Irico in meeting the Court's deadlines. Plaintiffs also query Irico's suggestion that the state secrets review requires eyes on every single document, or whether targeted search terms could be used to identify documents containing state secrets to speed up production. *See* Taladay Decl. ¶ 27 (describing the types of information that would qualify as state secrets).

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<sup>1</sup> <https://chinesenewyear.net/>.

<sup>2</sup> Neither of the websites Irico cites (Feb. 8, 2024 Letter at 3, n. 3) support its assertion that Irico and AnJie closed this week. Both websites confirm that the holiday does not begin until February 10, 2024.

<sup>3</sup> Many of the documents Irico produced in September and October 2023 were duplicates.

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Lastly, to the extent Your Honor is inclined to grant Irico an extension of the deadline, Irico should be required to produce responsive documents to Plaintiffs on a rolling basis.

In sum, a four-week extension of Your Honor's February 23, 2024 deadline is excessive and unnecessary when the main justification for that extension is a one-week national holiday. This is particularly true given that Irico has not been diligent in attempting to meet the February 23, 2024 deadline.

Very truly yours,

/s/ Mario N. Alioto

Mario N. Alioto  
Lead Counsel for Indirect Purchaser Plaintiffs

/s/ R. Alexander Saveri

R. Alexander Saveri  
Lead Counsel for Direct Purchaser Plaintiffs

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# **DOCUMENT 32**

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February 12, 2024

VIA E-MAIL [VRW@JUDGEWALKER.COM]

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The Honorable Vaughn R. Walker  
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Re: In re Cathode Ray Tube (CRT) Antitrust Litigation, MDL No. 1917, Master File  
No. 07-CV-944-JST

Dear Judge Walker:

We write briefly in reply to Plaintiff's February 9, 2024, letter opposing Irico's request for extension of time (the "Response") to comply with the Special Master's Report & Recommendation on Discovery Search Terms, ECF No. 6351.

Many of Plaintiffs' assertions in the Response seem designed principally to take potshots and incite artificial tensions. We will avoid responding to those assertions (e.g., questioning the existence of the Chinese Lunar New Year holiday, which is the most important holiday in China, as well as many other Asian countries), although our abstinence should not be taken as agreement with any of them. Rather, we write to make the following responsive points to certain statements in Plaintiff's Response.

First, we take exception to the assertion that Irico's actions are "inconsistent with its prior representations" to Your Honor, Response at 1, in the Declaration of John Taladay dated Oct. 23, 2023 ("Taladay Decl."), ¶ 25. Plaintiffs wrongly suggest that Irico did not meet its assurance that it had "collected and preserved" all documents that hit on Plaintiffs' search terms without 'Su qualifiers,' and that those documents 'remain[ed] on the China-based Relativity server awaiting the Special Master's decision.'" Response at 1 (quoting Taladay Decl., ¶ 25). To the contrary, Irico did exactly as stated in the Declaration in compliance with the procedures set out by the Court in its Order of September 1, 2023, ECF No. 6275 at 5 (requiring "collection of responsive documents" while allowing Irico to "withhold production" and raise search term disputes with Your Honor). Indeed, all documents that hit on search terms were preserved on the China-based Relativity server in October and have remained on that server in preparation for any further decision by the Special Master. This is an unbecoming attempt by Plaintiffs to twist an unwarranted complaint about timeliness into an assertion of misrepresentation.

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Second, Irico moved quickly to begin compliance with the Special Master's recommendation. As explained in our prior submission, running the search reports required coordination between Irico and eDiscovery vendor personnel, travel to the server location, rebooting and reconstituting the server (which is standard practice), and running the search term reports, a process that took approximately four days. To ensure the security of Chinese state secret information, the Relativity server was set up as an independent server especially for this discovery process. *See* Taladay Decl., ¶ 28 (describing state secret review process). To ensure no damage to the server while not in active use (e.g., from overheating), Irico's eDiscovery vendor shut the server down after the review process ended in the fall of 2023, with the understanding that the server can be rebooted within several days' time if the need arose. The server is maintained in Beijing, but it is not an active server and does not allow for remote access. Therefore, Irico personnel were required to coordinate access to the server, travel from Xianyang to Beijing, and personally accompany BDO staff (Irico's eDiscovery vendor) to access the secure server. Once there, the server was restarted and the parties were able to begin the process of running the search terms, de-duplicating, etc. Irico's counsel was in contact with Plaintiffs' counsel before beginning the searches and once the searches were completed. On the parties' meet and confer on February 2, 2024, Irico's counsel explained to Plaintiffs' counsel that substantial time and effort were required to access the server, run searches, and set up the review, regardless of the volume of documents to be reviewed.

Third, Plaintiffs state that Irico has "failed to state whether it de-duped the search results." Response at 2. The document counts provided to Plaintiffs and the Special Master, both in October 2023 and on February 8, 2024, for the new search terms, have been de-duplicated by BDO using standard eDiscovery tools based on document metadata. Irico also clarified for Plaintiffs that the new search term hit results do not include documents that were previously reviewed for production in October 2023.

Finally, Plaintiffs complain that the additional four weeks requested by Irico for this review might threaten the trial calendar in this case. In our meet and confer last week, we asked the Plaintiffs to consider foregoing or curtailing this additional review in the interests of moving more expeditiously to trial, but they flatly refused. Instead, they argue that Irico should be required to conduct the review in a timeframe that is not possible, and then criticize Irico for requesting the reasonable time that the review will require.

Plaintiffs postulate that the required process should be a "simple matter," Response at 1, but everything is simple when you are not the one doing it. Any suggestion that Irico's response somehow shows a disregard for the Court's authority is absurd. Irico intends to fully comply with Your Honor's requirements but requires additional time for that compliance. Irico has no interest in belaboring this review and is prepared to work aggressively to complete it. The requested extension until March 25, 2024, reflects an expeditious timeframe for the scope of this exercise, and we respectfully request that the Special Master grant the requested extension.

**BAKER BOTTS** LLP

The Honorable Vaughn R. Walker

- 3 -

Sincerely,  
*/s/ John M. Taladay*  
John M. Taladay

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# **DOCUMENT 33**

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April 3, 2024

***VIA EMAIL***

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**Re: *In re Cathode Ray Tube (CRT) Antitrust Litigation – MDL No. 1917, Master File No. 07-CV-5944-JST***

Dear Judge Walker:

The Indirect Purchaser Plaintiffs (“IPPs”) and the Direct Purchaser Plaintiffs (“DPPs”) (together, “Plaintiffs”) write regarding the March 25, 2024 production of documents by Defendants Irico Group Corp. and Irico Display Devices Co., Ltd. (together, “Irico”) pursuant to Your Honor’s Report & Recommendation on Discovery Search Terms (ECF No. 6351), as modified and adopted by the Court (ECF No. 6357).

Irico’s recent production is the fourth batch of documents produced by Irico relating to its failure to produce Su Xiaohua for his Court-ordered deposition in June 2022. This time, after informing the Court that 28,000 documents required review, Irico produced just 127 pages, many of which are redacted.<sup>1</sup> None of the recently produced documents changes the facts relating to Irico’s failure to produce Mr. Su. *See* Plaintiffs’ Nov. 16, 2023 Letter. The production confirms that Mr. Su continued to work at Irico after May 25, 2022—the date Irico falsely claimed he retired and “terminated all relationships”<sup>2</sup> with Irico.<sup>3</sup>

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<sup>1</sup> Copies of Irico’s Second Supplemental Su Privilege Log and its Supplement Su State Secret Log dated March 25, 2024, are provided herewith. Your Honor’s Interim Report & Recommendation on Plaintiffs’ Motion for Discovery Sanctions required Irico to “translate in full without redactions” all documents listed on its privilege log and submit them to Your Honor for *in camera* review. ECF No. 6264 at 9.

<sup>2</sup> Irico Opp. to Plaintiffs’ Motion for Sanctions at 27, 33.

<sup>3</sup> Along with previously produced documents, the recent documents confirm that Mr. Su continued working with colleagues in June 2022, *after* Irico informed Plaintiffs that he had resigned. *See, e.g.*, IRI-SU-001595 (messages between Su and a subordinate) and IRI-SU-001634 (instructions from Su to a subordinate) (Attachments 1 and 2 hereto).



The Honorable Vaughn R. Walker

4/3/2024

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None of the recently produced documents is exculpatory in any way for Irico. Nor do the documents support any of Irico's implausible claims in its ever-changing story regarding Mr. Su.

For example, no document supports Irico's implausible claim that—despite having granted Mr. Su permission to go “off duty and rest” before he was eligible for that status<sup>4</sup>—Irico personnel were “surprised” when he purportedly chose to leave his position in June 2022 rather than appear for his deposition.<sup>5</sup> Likewise, no document supports Irico's equally implausible claim that the personnel who approved Mr. Su's application to go “off duty and rest” were unaware that Irico was under a Court Order to produce Mr. Su for deposition.<sup>6</sup>

On the contrary, the evidence shows that Irico's Chairman Si Yuncong and General Manager Yang Yuanjang, both of whom were involved in the April 7, 2022 decision to allow Mr. Su to go “off duty and rest” before he was eligible, also approved the legal department's January 2022 request for Mr. Su and others to travel to Hong Kong for deposition<sup>7</sup> and its May 2022 request to travel to Macau.<sup>8</sup> Thus, Irico's leaders were well aware that Irico was under a Court Order to produce Mr. Su for deposition when they approved his request to go off duty early. Irico's claims that “Mr. Su's pending deposition was not raised, discussed or considered by the participants in the April 7 Meeting[,]” and that “[t]he April 7 Meeting did not specify a particular date by which Mr. Su could or would resign from his positions[,]”<sup>9</sup> also remain unsupported—and highly implausible.

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<sup>4</sup> See Hwu Nov. 16, 2023 Decl. Ex. B at IRI-SU-000402E (Irico document explaining that Mr. Su was not eligible to go “off duty and rest” until December 2022).

<sup>5</sup> See Irico Nov. 28, 2023 Letter at 3 (claiming “Mr. Su's departure was indeed a complete surprise”).

<sup>6</sup> *Id.* at 3 (claiming without support that the Irico staff involved in approving his off duty and rest status “had no reason to know of Mr. Su's planned deposition”); *id.* at 9 (speculating that “Mr. Su may very well have taken advantage of separate, unconnected processes for his request to resign his management position and the Irico Group legal department's efforts to plan his travel for deposition in 2022 to secure the former and escape the latter.”).

<sup>7</sup> See Plaintiffs' Reply ISO Motion for Sanctions, Rushing Decl. Exs. 17 & 18 (IRI-SU-000129E and 130E).

<sup>8</sup> See Irico Opp. to Plaintiffs' Motion for Sanctions, Carter Decl. Exs. T & J (IRI-SU-000131E and 132E).

<sup>9</sup> Irico “Clarification Letter” dated Nov. 16, 2023 at 1.

The Honorable Vaughn R. Walker

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Even though Irico now admits that the April 7 authorization allowed Mr. Su to step back from his managerial duties *before* December 2022,<sup>10</sup> Irico's latest search has failed to yield a single document specifying the date Mr. Su was supposed to leave his position. All of the Irico documents relating to Mr. Su going off duty to rest are conspicuously silent on exactly when he would leave his position. It is highly improbable that Irico leaders would have granted Mr. Su permission to leave his position "ahead of schedule" but fail to specify in writing—or even discuss—when exactly that would happen. Irico has either destroyed this evidence or is continuing to withhold it, or the authors of its documents were very careful not to record the date Mr. Su was supposed to go "off duty and rest." All of these explanations evidence a desire to conceal this information.

In addition, Irico's latest search has also failed to yield a single email, text message, or voicemail from anyone at Irico urging Mr. Su to attend his deposition, much less compelling him to do so. Thus, there is no support for Irico's repeated claims that it attempted "to convince Mr. Su to appear for deposition."<sup>11</sup> This is significant not only because it is yet another example of Irico's lack of candor, but also because Irico was under a Court Order to produce Mr. Su for his deposition. Irico was therefore required "to use its best efforts to secure [Mr. Su's] attendance at the deposition." *Sali v. Corona Reg'l Med. Ctr.*, 884 F.3d 1218, 1224 (9th Cir. 2018) (Rule 37(b)(2)(B) provides for sanctions "[i]f a party fails to comply with an order under Rule 35(a) requiring it to produce another person for physical or mental examination."). Irico has not established that it has done so.

That Irico gathered documentation for Mr. Su's visa falls far short of demonstrating that Irico used its "best efforts" to secure his attendance at his deposition after his purported refusal. This is particularly true given that Irico's leaders granted Mr. Su permission to go "off duty" early—which allowed him to continue to be paid—without requiring him to attend his Court-ordered deposition. To make matters worse, Irico then falsely represented

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<sup>10</sup> In its Opposition to the Sanctions Motion, Irico insisted that the April 7, 2022 meeting minutes showed that Mr. Su was supposed to leave his position at the end of December 2022. *See* Irico Opp. at 31 (citing April 7, 2022 meeting minutes and claiming "Irico was operating under the belief that Mr. Su fully intended to appear for his deposition, under the firm belief that he did not plan to retire until December 2022."). Only in November 2023—after it was ordered to produce additional documents, and well over a year after Plaintiffs raised questions about the circumstances of Mr. Su's resignation—did Irico "clarify" that its leaders had approved Mr. Su's request to leave his position *before* December 2022 at the April 7, 2022 meeting. *See* Irico Clarification Letter at 1.

<sup>11</sup> Irico Opp. to Sanctions Motion at 27. *See also* ECF No. 6101 at 9 ("When Irico's in-house counsel learned of Mr. Su's resignation on May 31, 2022, Irico tried to convince Mr. Su to reverse his decision[.]"). The Court already found this claim to be unsubstantiated. ECF No. 6115 at 10 ("But Irico provides no information supporting its assertions that Su Xiaohua's nonappearance was outside of its control or that Irico made efforts to persuade Su Xiaohua to appear for his deposition as Irico did for the two other Irico witnesses.").

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that Mr. Su had retired and had terminated all relationships with Irico—and withheld key evidence to the contrary in contravention of a Court Order—to justify its claim that he could not be compelled to attend his deposition.

In sum, the numerous inconsistencies and evidentiary gaps in Irico’s implausible explanations regarding its failure to produce Mr. Su for deposition, together with its repeated misrepresentations, compel a finding that it acted in bad faith and that it intentionally deprived Plaintiffs of the evidence Mr. Su could have provided. *See InternMatch, Inc. v. Nxtbigthing, LLC*, No. 14-CV-05438-JST, 2016 WL 491483, at \*11–14 (N.D. Cal. Feb. 8, 2016), *vacated on other grounds*, No. 14-CV-05438-JST, 2017 WL 8944065 (N.D. Cal. Nov. 17, 2017) (finding defendants had acted in bad faith with intent to deprive where “the alleged chronology of events [was] highly improbable, [and] [d]efendants’ story [was] filled with inconsistencies[,]” and ordering severe sanctions); *Torgersen v. Siemens Bldg. Tech., Inc.*, No. 19-CV-4975, 2021 WL 2072151, at \*4–5 (N.D. Ill. May 24, 2021) (concluding that plaintiff’s destruction of evidence was an “intentional act designed to deprive Defendants of relevant ESI” because his “shifting explanations” lacked credibility and the timing of the spoliation suggested it was in response to discovery requests).

Mr. Su was an important witness that Irico identified as having “personal knowledge of matters that are highly relevant to this litigation and is likely the only Irico witness with personal knowledge of key facts and events.” ECF No. 6115 at 10. The Court has found that Irico’s failure to produce him for deposition prejudiced Plaintiffs (and the Court) and delayed these proceedings. August 11, 2022 Transcript of Proceedings Denying Emergency Motion For Relief from Scheduling Order (ECF No. 6047) at 12-13. This harm compounds the great prejudice already caused by Irico’s disappearance from this litigation for seven years, its near total destruction of relevant documentary evidence, its repeated violations of Court orders, and its myriad misrepresentations of material facts to Plaintiffs and the Court. Accordingly, Plaintiffs respectfully request that the Court grant their motion for terminating sanctions.

Very truly yours,

/s/ Mario N. Alioto

Mario N. Alioto  
Lead Counsel for Indirect Purchaser Plaintiffs

/s/ R. Alexander Saveri

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# **ATTACHMENT 1**



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<b>CORRESPONDENCE / EXCEL FILE</b>
<b>IRI-SU-001595</b>

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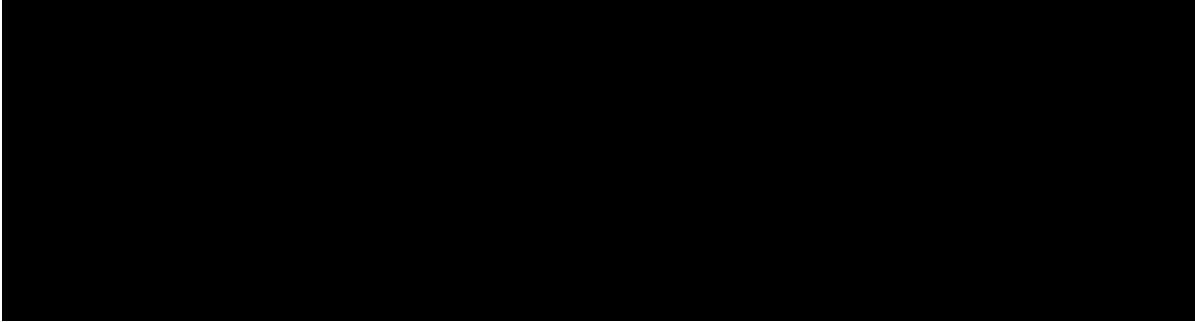
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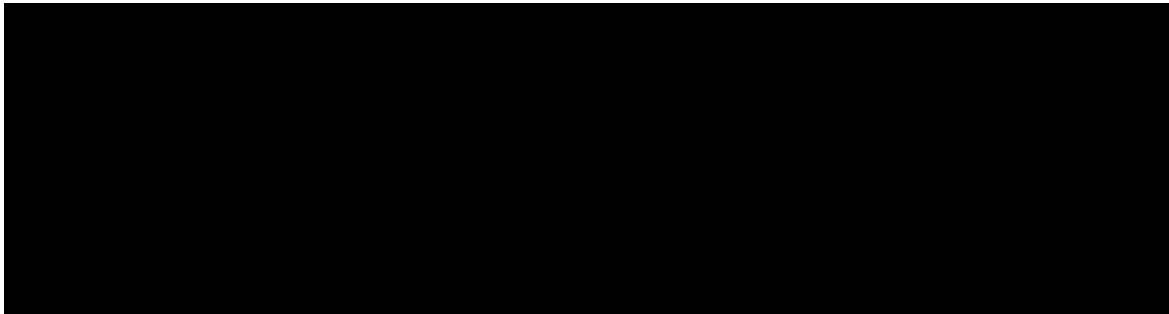
IN WITNESS WHEREOF, Language Fish LLC has caused the Certificate to be signed by its duly authorized officer(s).

By: Sean Kirschenstein, Director

Date: April 1, 2024

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# **ATTACHMENT 2**



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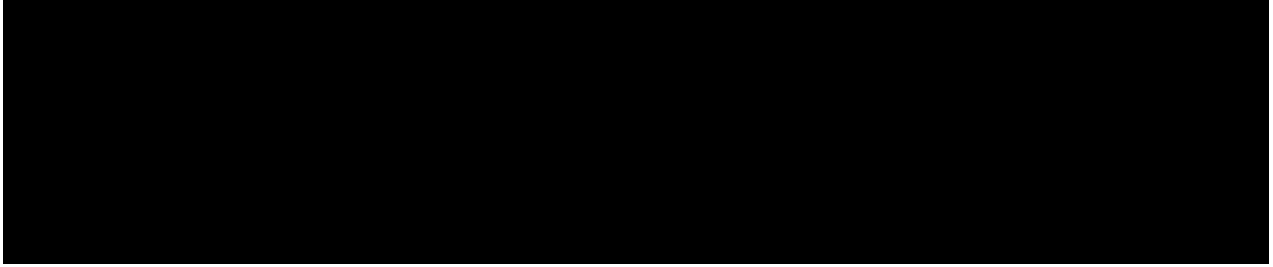
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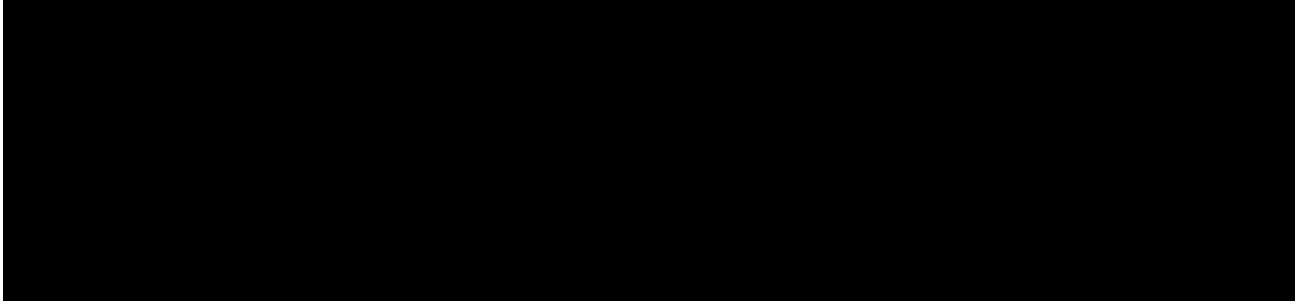
IN WITNESS WHEREOF, Language Fish LLC has caused the Certificate to be signed by its duly authorized officer(s).

By: Sean Kirschenstein, Director

Date: April 1, 2024

A copy of the translated version(s) is attached to this statement of certification.





# DOCUMENT 34

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April 10, 2024

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The Honorable Vaughn R. Walker  
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Re: In re Cathode Ray Tube (CRT) Antitrust Litigation, MDL No. 1917, Master File  
No. 07-CV-944-JST

Dear Judge Walker:

Defendants Irico Group Corp. and Irico Display Devices Co., Ltd. (collectively, “Irico”) respectfully submit this response to Plaintiffs’ April 3, 2024, supplemental letter brief regarding Irico’s recent supplemental production of documents relating to former Irico employee Su Xiaohua (“April 3 Letter Br.”).

Plaintiffs’ supplemental letter all but admits that the additional documents produced most recently by Irico under the Special Master’s Report & Recommendation on Discovery Search Terms (ECF No. 6351) were innocuous and fail to support Plaintiffs’ arguments for terminating or other severe sanctions. Plaintiffs instead rehash old arguments that never supported terminating sanctions and attempt to manufacture an inference of improper intent based on a *lack* of supporting evidence. But Plaintiffs bear the burden of proof and such an inference would be unjustified. Plaintiffs’ motion for sanctions should be denied.

Plaintiffs begin their letter by insinuating that the relatively small volume of responsive documents in Irico’s most recent production somehow reflects a lack of forthrightness by Irico. This is categorically false. Instead, the lack of documents in the most recent production confirms that Plaintiffs’ search terms were unnecessarily broad and did not lead to a significant number of additional responsive documents. As Irico anticipated and explained to Plaintiffs, the modest size of this final production was completely expected given the nature of the unbounded search terms required by Plaintiffs and the fact that the documents most likely to be relevant to Mr. Su’s departure or deposition – i.e., all documents that identified Mr. Su and any substantive search term (such as “retirement” or “deposition”) – were already provided in prior productions. By definition, the documents included in this latest production were those that did not include both a search term identifying Mr. Su and a potentially relevant search term. As expected, this resulted in a significantly lower responsiveness rate. *See* Irico Status Update and Request for Extension (Oct. 9, 2023) at 6 n.7 (explaining that documents “that did not hit on any ‘Su qualifiers’” making up

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this latest production were “the documents *least* likely to contain responsive material”); Taladay Decl. (Oct. 23, 2023) ¶¶ 23-24 (noting that the search terms requested by Plaintiffs “omitted any requirement that the search terms be related in any way to Mr. Su,” causing search results to balloon to “55% of every message or document sent or received by every custodian” during the relevant time period). Plaintiffs’ implicit suggestion that Irico exaggerated the volume for review or over-withheld documents<sup>1</sup> ignores this reality.

Because these newly produced documents offer no support for Plaintiffs’ theory of a company-wide conspiracy to prevent Mr. Su’s deposition, they instead attempt to argue that the minimal documentation surrounding Mr. Su’s departure somehow shows bad faith on Irico’s part.<sup>2</sup> See April 3 Letter Br. at 3 (arguing that “Irico’s latest search has failed to yield” documents either “specifying the date Mr. Su was supposed to leave his position” or “urging Mr. Su to appear for deposition”). This attempt willfully ignores the more obvious explanation: there is no evidence of such a plot because no such plot existed. It also ignores the fact that such documents *could not rationally* have been included in this latest production, because they would necessarily be directed to Mr. Su (or at least mention him by name) *and* include one of the many substantive search terms used for Irico’s October 2023 productions. See Taladay Decl. ¶ 24. Plaintiffs’ illogical insistence that Irico must disprove Plaintiffs’ unfounded allegation of a conspiracy to prevent Mr. Su’s deposition effectively amounts to an admission that there is *no* support for finding any such intent to deprive Plaintiffs of relevant evidence. Despite Plaintiffs’ efforts to confuse the issue, Plaintiffs – not Irico – bear the burden of proof on their motion and they have failed to show any intent to deprive.

Contrary to Plaintiffs’ argument – which is based entirely on documents produced more than a year ago with nothing new from the most recent production – it would not be correct to infer bad faith from the mere fact that two Irico Group leaders had previously approved forms seeking to obtain visas for a group of Irico employees to travel to Hong Kong. See April 3 Letter Br. at 2. The document cited by Plaintiffs shows only that Mr. Su’s name was briefly mentioned as part of a group of five individuals – including witnesses and supporting personnel – for which Irico’s Legal Affairs Department was managing the administrative process “to apply for one-year

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<sup>1</sup> Plaintiffs misleadingly cite the Special Master’s August 4, 2023 Order, which required Irico to translate and submit for *in camera* review the documents listed on its previously-produced privilege log that was attached as Exhibit NN to Plaintiffs’ initial sanctions motion papers. ECF No. 6264 at 1, 9 & n.7. Irico fully complied with that requirement on September 1, 2023.

<sup>2</sup> Bad faith would be a necessary element, but not sufficient on its own, to justify terminating sanctions, especially when (as here) a case can still be resolved on the merits and lesser sanctions are available. See *In re Google Play Store Antitrust Litig.*, No. 21-md-02981-JD, 2023 WL 2673109, at \*9 (N.D. Cal. Mar. 28, 2023) (courts should not order terminating sanctions when “lesser measures . . . would be sufficient to redress” the violation); *Apple Inc. v. Samsung Elecs. Co.*, 888 F. Supp. 2d 976, 993-94 (N.D. Cal. 2012) (courts should choose “the least onerous sanction corresponding to the willfulness of the destructive act and the prejudice suffered by the victim”).

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multiple-entry Hong Kong passes and visas” in January 2023. Plaintiffs’ Reply Br. (May 26, 2023), Saveri Decl. Ex. 17 (IRI-SU-000129) (“After discussion, IRICO Group plans to send five people including Wang Zhaojie, Su Xiaohua, Zhang Wenkai, Shang Tingting and Ma Ding to Hong Kong for evidence collection work.”). Mr. Su was not the focus of that request and there is no evidence indicating that any issue regarding Mr. Su came up between approval of the travel request and the consideration, months later, of Mr. Su’s request to leave his positions early in April 2022. It would not be reasonable to assume, as Plaintiffs do, that these Irico leaders approved Mr. Su’s departure as part of a plot to prevent his deposition, particularly because the meeting minutes reflecting that approval show the opposite: that Mr. Su’s pending deposition was not discussed and played no part in the decision. *See* Irico Clarification Letter (Nov. 16, 2023), Attachment A (IRI-SU-000137) at -139E.

Indeed, there is nothing in the record to suggest that these two executives had any knowledge at all that Mr. Su would depart prior to giving a deposition. To the contrary, the same executives approved a similar form *after* the April 7, 2022, meeting regarding Mr. Su’s request to resign early from his management roles, to approve a travel plan to Macau, again submitted by the Irico Group Legal Affairs Department and again listing Mr. Su as one of five individuals seeking a travel permit, in early May of 2022. *See* Irico Opp. (Apr. 21, 2023), Carter Decl. Exs. J, T (showing Macau travel request submitted on May 6 and approved by Messrs. Yang and Si on May 7 and 9, 2022, respectively). Submitting or approving that alternative plan would have made little sense if either the Legal Affairs Department or the Irico Group leadership were cognizant of Mr. Su’s intent to depart imminently. Once again, the obvious explanation is *not* the existence of a grand conspiracy to prevent Mr. Su’s deposition, but rather that Irico’s executives were simply unaware that Mr. Su was planning to leave his position before giving a deposition. *See* Irico Response to Pls.’ Supp. Br. (Nov. 28, 2023) at 9 (“Mr. Su may very well have taken advantage of separate, unconnected processes for his request to resign his management positions and the Irico Group legal department’s efforts to plan his travel for deposition in 2022 to secure the former and escape the latter.”).

Plaintiffs bear the burden of showing that Irico acted with specific intent to deprive them of relevant evidence, but there remains no evidence justifying such a conclusion and thus no basis for terminating or other severe sanctions. Such extreme sanctions are appropriate only as a last resort and only when misconduct is both (1) made with specific intent to deprive the other party of evidence in litigation, and (2) so severe that it is no longer possible to resolve a case on the merits. *See Sec. Alarm Fin. Enters., L.P. v. Alarm Prot. Tech., LLC*, No. 3:13-CV-00102-SLG, 2016 WL 7115911 at \*2 (D. Alaska Dec. 6, 2016) (a court “may not impose the harshest sanctions unless it also finds that the spoliating party acted with the intent to deprive another party of the information’s use in the litigation”); *Leon v. IDX Sys. Corp.*, 464 F.3d 951, 958 (9th Cir. 2006) (terminating sanctions only justified when a party has “engaged deliberately in deceptive practices that undermine the integrity of judicial proceedings” or “willfully deceived the court and engaged in conduct utterly inconsistent with the orderly administration of justice”); *Atl. Recording Corp. v. Howell*, No. CV-06-02076-PHXNVW, 2008 WL 4080008, at \*2 (D. Ariz. Aug. 29, 2008) (terminating sanctions only appropriate where misconduct caused such severe prejudice that it



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“ma[kes] it impossible to decide the case on the merits”).<sup>3</sup> In a last-ditch attempt to justify these groundless “death penalty” sanctions against Irico, Plaintiffs repeat the error of their earlier briefing and cite only isolated snippets of caselaw while ignoring (or hiding) the specific facts and holdings of each case. Plaintiffs have failed to find even one case that supports the extreme remedy of terminating sanctions here.<sup>4</sup> The cases Plaintiffs again selectively cite in their most recent submission confirm this point:

- First, in *Sali v. Corona Regional Medical Center*, the district court ordered, and the Ninth Circuit affirmed, an award of only *monetary* sanctions – “the mildest of the possible Rule 37 sanctions” – for a party’s failure to make “any effort” whatsoever to secure its own expert’s attendance at a deposition. 884 F.3d 1218, 1225 (9th Cir. 2018). That holding does not support any sanction here, where Irico clearly made efforts to secure Mr. Su’s travel for deposition before he announced that he would no longer cooperate with those efforts. *See* Irico Clarification Letter (Nov. 16, 2023) at 2.
- Second, in *InternMatch, Inc. v. Nxtbighthing, LLC*, Judge Tigar denied a party’s request for terminating sanctions because, as here, it was still possible to “resolve this case on the merits.” No. 14-CV-05438-JST, 2016 WL 8944065, at \*13 (N.D. Cal. Feb. 8, 2016) (granting lesser sanctions that “largely if not entirely cured” prejudice from willful destruction of evidence), *vacated on other grounds*, 2017 WL 8944065 (N.D. Cal. Nov. 17, 2017).
- Finally, the court in *Torgersen v. Siemens Building Technology, Inc.* also declined to impose the requested terminating sanction for a party’s intentional deletion of his Facebook account “in response to [a] discovery request” despite finding intent to deprive the requesting party of relevant discovery, holding that “there are certainly less drastic sanctions available that will remedy the prejudice . . . and allow the case to be heard on the respective merits.” No. 19-cv-4975, 2021 WL 2072151, at \*5 (N.D. Ill. May 24, 2021).

None of these cases come close to justifying terminating sanctions against Irico for Mr. Su’s departure and refusal to cooperate with Irico in providing his testimony or for any of the other allegations raised by Plaintiffs in their motion.

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<sup>3</sup> Despite Plaintiffs’ protestations to the contrary, Mr. Su had only a limited role regarding CRTs and would have had minimal additional information regarding their allegations, if any. *See* Irico Response to Pls.’ Supp. Br. (Nov. 28, 2023) at 7-8 (explaining why Mr. Su is not a key witness in light of the full volume of evidence already obtained by Plaintiffs).

<sup>4</sup> Irico previously reviewed the facts and holdings of each case cited by Plaintiffs in their briefing to illustrate how Plaintiffs misstated the facts or failed to alert the Special Master that the Court had not awarded terminating sanctions in the very cases that they cite to support terminating sanctions here. *See* Opp’n (Apr. 21, 2023) 5-8; Surreply (June 9, 2023) 2-4.

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\* \* \*

The Special Master should deny Plaintiffs' request for terminating sanctions and their alternate request for adverse inference, striking of defenses, and other extreme sanctions.

Sincerely,  
*/s/ John Taladay*  
John Taladay

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